

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
Section 1.0 - Respondent Information		
1. Provide the full legal, registered name and mailing address of Respondent.	Port of Portland 121 NW Everett Street Portland, Oregon 97209-4049	
2. For each person answering these questions on behalf of Respondent, provide: a. full name; b. title; c. business address; and d. business telephone number, electronic mail address, and FAX machine number.	<p>1. Nicole LaFranchise Environmental Project Manager Port of Portland 121 NW Everett Portland, OR 97209</p> <p>(503) 944-7323 - office (503) 944-7353 - fax</p> <p>Nicole.LaFranchise@portofportland.com</p> <p>2. Sara Moore Environmental Liability Analyst Port of Portland 121 NW Everett Portland, OR 97209</p> <p>(503) 944-7033 - office (503) 548-5780 - fax</p> <p>Sara.Moore@portofportland.com</p> <p>3. Ash Creek Associates Amanda Spencer, Principal Ashleigh Fines, Senior Staff, Geology Group 9615 SW Allen Boulevard, Suite 106 Portland, Oregon 97005-4814</p> <p>(503) 924-4707 - office (503) 924-4707 - fax</p> <p>aspencer@ashcreekassociates.com afines@ashcreekassociates.com</p>	

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
<p>3. If Respondent wishes to designate an individual for all future correspondence concerning this Site, please indicate here by providing that individual's name, address, telephone number, fax number, and, if available, electronic mail address.</p>	<p>Nicole LaFranchise Environmental Project Manager Port of Portland 121 NW Everett Portland, OR 97209</p> <p>(503) 944-7323 - office (503) 944-7353 – fax</p> <p>Nicole.LaFranchise@portofportland.com</p>	
Section 2.0 - Owner/Operator Information		
<p>4. Identify each and every Property that Respondent currently owns, leases, operates on, or otherwise is affiliated or historically has owned, leased, operated on, or otherwise been affiliated with within the Investigation Area during the period of investigation (1937-Present). Please note that this question includes any aquatic lands owned or leased by Respondent.</p> <p>a. Currently Owns b. Currently Leases c. Currently Operates d. Historically Has Owned e. Historically Has Leased f. Historically Has Operated</p>	<p>This response addresses the Port of Portland's Marine Terminal 2 property, which consists of approximately 47 acres located on the west side of the Willamette River between River Miles 9.8 and 10 and between NW Front Avenue and the Willamette River, downstream of the Fremont Bridge. It is situated in Section 28 and Section 20 of Township 1 North, Range 1 East of the Willamette Meridian. Property addresses associated with the Terminal 2 property range from 3074-3576 NW Front Avenue, Portland, Multnomah County, Oregon. For purposes of remedial investigation, the Terminal 2 property is known as the Terminal 2 Upland Facility.</p> <p>The Port is the current owner of the Terminal 2 property. The Port acquired certain property and improvements within what is the Terminal 2 property from the City of Portland Commission of Public Docks (City CPD) effective January 1, 1971. In 1978, the Port sold approximately 2.93 acres of former Terminal 2 property to Bingham-Willamette Corporation (a division of Guy F. Atkinson). The 2.93-acre parcel is currently part of the adjacent Sulzer Pumps U.S. property. The Terminal 2 property is partially comprised of riverbed filled prior to Port ownership by predecessor owners who had not purchased the filled riverbed from the State. After the Port's acquisition, a former slip was filled under COE Permit 5487 and State Land Board Fill Removal Permit 4064. In November 1987, under a property sale and settlement with the Port, the State Land Board, then acting through the Division of State Lands, quitclaimed to the Port any ownership interests the State had in Terminal 2 above the line of ordinary high water.</p> <p>As the owner, the Port engages in property management and maintenance at the Terminal 2 property. The Port also has maintenance responsibilities for the craneways and berths. From 1971 to 1974, the Port's activities at Terminal 2 also included limited receipt and delivery (loading and unloading) from rail and trucks, and for a period of time between 1975 and 1981, the Port used part of Terminal 2 for moorage of the Dredge Oregon and the Steamer Portland.</p> <p>Since its acquisition, the Port has entered into leases and other agreements for use of the Terminal 2 property by entities who are responsible for operations at their lease or use areas. The Port currently holds leases or other agreements for use of the Terminal 2 property with the following tenants:</p> <ul style="list-style-type: none"> Alexander Gow, Inc. 	<p>See CPD bargain and sale deed at Tab 2 of the Port's 104(e) response for Terminal 1 North, submitted to EPA on July 16, 2008.</p> <p>See DSL Settlement and Mutual Release at Tab 1 of the Port's 104(e) response for Terminal 1 South, submitted to EPA and dated August 16, 2008.</p> <p>See agreements at Tab 1.</p> <p>See deeds and easements at Tab 2.</p> <p>See property transaction records at Tab 5.</p> <p>See site investigation records at Tab 6, specifically:</p> <p>Port of Portland. 2000. Preliminary Assessment, Port of Portland, Terminal 2, 3556 NW Front Avenue, Portland, Oregon, 97210. August 29, 2000.</p>

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
	<ul style="list-style-type: none"> • International Raw Materials Ltd. • National Cargo Bureau • Pacific Maritime Association • APL Logistics Americas, Ltd. • Regional Maritime Security Coalition • Stevedoring Services of America, Inc. • U.S. Army Corp of Engineers <p>Specific information on current and historical tenants and their respective operations is discussed in response to Question 11.</p>	
<p>5. Provide a brief summary of Respondent's relationship to each Property listed in response to Question 4 above, including the address, Multnomah County Alternative Tax lot Identification number(s), dates of acquisition, period of ownership, lease, operation, or affiliation, and a brief overview of Respondent's activities at the Properties identified.</p>	<p>The Port is the current owner of certain property and improvements within the Terminal 2 property. The addresses for the Terminal 2 property range from 3074-3576 NW Front Avenue. Details on the tax lots that comprise the property are summarized below:</p> <p>3154 NW Front Avenue</p> <ul style="list-style-type: none"> • Tax Lot 300 – Tax Lot ID #1N1E28B 300; Total Acreage: 0.81; the Port acquired the tax lot in 1971 from the City CPD. The Multnomah County Alternative Tax Lot Identification Number for Tax Lot 300 is R941280630. <p>3556 NW Front Avenue</p> <ul style="list-style-type: none"> • Tax Lot 100 – Tax Lot ID #1N1E28B 100; Total Acreage: 12.65; the Port acquired the tax lot in 1971 from the City CPD. The Multnomah County Alternative Tax Lot Identification Number for Tax Lot 100 is R941280500. • Tax Lot 200 – Tax Lot ID #1N1E28B 200; Total Acreage: 0.35; the Port acquired the tax lot in 1971 from the City CPD. The Multnomah County Alternative Tax Lot Identification Number for Tax Lot 200 is R941280710. • Tax Lot 400 – Tax Lot ID #1N1E28B 400; Total Acreage: 18.37; the Port acquired the tax lot in 1971 from the City CPD. The Multnomah County Alternative Tax Lot Identification Number for Tax Lot 400 is R941280440. • Tax Lot 500 – Tax Lot ID #1N1E28B 500; Total Acreage: 0.62; the Port acquired the tax lot in 1971 from the City CPD. The Multnomah County Alternative Tax Lot Identification Number for Tax Lot 500 is R941280650. • Tax Lot 700 – Tax Lot ID #1N1E28B 700; Total Acreage: 0.49; the Port acquired the tax lot in 1971 from the City CPD. The Multnomah County Alternative Tax Lot Identification Number for Tax Lot 700 is R941280820. 	<p>See property transaction records at Tab 5, specifically:</p> <p>Hahn and Associates, Inc. 2005. A Phase I Environmental Site Assessment, Volume I, Approximate 52.03-acre Port of Portland Terminal 2 Property, 3074-3576 NW Front Avenue, Portland, Oregon. Prepared for the Port of Portland. May 31, 2005.</p> <p>See site investigation records at Tab 6, specifically:</p> <p>Port of Portland. 2000. Preliminary Assessment, Port of Portland, Terminal 2, 3556 NW Front Avenue, Portland, Oregon, 97210. August 29, 2000.</p>

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
	<ul style="list-style-type: none"> Tax Lot 800 – Tax Lot ID #1N1E20 800; Total Acreage: 18.81; the Port acquired the tax lot in 1971 from the City CPD. The Multnomah County Alternative Tax Lot Identification Number for Tax Lot 800 is R941201280. <p>As described in response to Question 4 above, the Port's activities (1971-present) at the Terminal 2 property have included property management of tenants that leased the warehouses, yard space and berths at the property, and limited receipt and delivery (loading and unloading) from rail and trucks from 1971 to 1974. The Port also used part of Terminal 2 for moorage of the Dredge Oregon and the Steamer Portland for a period of time between 1975 and 1981.</p>	
6. Identify any persons who concurrently with you exercises or exercised actual control or who held significant authority to control activities at each Property, including:	See response to 6 (a) through (i) below.	
a. partners or joint venturers;	Not applicable.	
b. any contractor, subcontractor, or licensor that exercised control over any materials handling, storage, or disposal activity on the Property; (service contractors, remediation contractors, management and operator contractors, licensor providing technical support to licensed activities);	<p>Material handling and disposal at the Terminal 2 property are described further in response to Question 64. The contractors associated with those occurrences are as follows:</p> <ul style="list-style-type: none"> Aptus Environmental Services, Inc – transported and disposed of waste generated from PCB transformer removal. Chemical Waste management – disposed of non-hazardous materials from steam cleaning sump and other cleanup activities. Chem-Security Systems – transported non-hazardous waste from drain cleanout. General Electric – removed and disposed of transformers with PCB-containing oil. Hahn and Associates – characterized waste from drain cleanout activities in 1994. Hazmat Environmental Group, Inc. – transported for disposal transformers containing PCB-containing oil. Northwest Field Services – removed liquid, non-hazardous waste generated from drain clean-out activities. Riedel Environmental Services, Inc. – removed and transported waste generated from removal of transformers with PCB-containing oil and transformers with non-PCB oil. Spencer Environmental Services, Inc. (SES) – removed non-hazardous waste generated from the steam cleaning sump. Terra Hydr, Inc. – removed and excavated fuel from tanks, tanks, and impacted soil during the 1997 decommissioning of three USTs. Unison Private Truck Fleet and Environmental Transportation Services – transported transformers with PCB-containing oil for disposal. Wark Trucking and Excavating – transported waste generated from the drain clean-out. Waste Management, Inc. – removes solid, non-hazardous waste periodically or as needed. 	<p>See site investigation records at Tab 6, specifically:</p> <p>Hart Crowser. 1998. Underground Storage Tanks Decommissioning Report, Port of Portland Terminal 2, Portland, Oregon. February 23, 1998.</p> <p>Port of Portland. 2000. Preliminary Assessment, Port of Portland, Terminal 2, 3556 NW Front Avenue, Portland, Oregon, 97210. August 29, 2000.</p> <p>Port of Portland. 2000. Terminal 2, Preliminary Assessment Appendix I.</p> <p>See other environmental records at Tab 7, specifically:</p> <p>Fax to Dick Rush regarding Status of Terminal 2 Crane 2372 PCB Transformer Material Disposal. December 22, 1989.</p> <p>Annual Document for Disposition of PCB Transformers, Terminal 2. March 19, 1990. Letter to William J. Lish, Port of Portland,</p>

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
		<p>Subject: Hazardous Waste Manifest No. 28361, General Electric Tracking No. 21440. July 5, 1988.</p> <p>Letter to Cindy Grant, Riedel Environmental, regarding GE Tracking No.21440, Original Generator: Port of Portland. August 17, 1988.</p> <p>Letter to Brett Hockley regarding Terminal 2 - Crane 2371 PCB Transformer Disposal. September 20, 1988.</p> <p>Hahn and Associates. 1993. Abandoned Drum Disposal, Marine Terminals 2, 4 and 6, Port of Portland, Portland, Oregon. March 5, 1993.</p> <p>Letter to Dick Rush regarding Terminal 2 - Crane 2372 PCB Transformer Disposal, Project 29906/415. March 16, 1990.</p> <p>Letter Report to Russ Korvola regarding Disposal of Grease Pit Sludge, Marine Terminal 2, Port of Portland, Portland, Oregon. September 19, 1992.</p> <p>Letter Report to Russ Korvola regarding POP Terminal 2 and Terminal 4 PCB Disposal Assistance. April 11, 1990.</p> <p>Letter to Ralph Piccolo, Port of Portland, Subject: Hazardous Waste Manifest for Terminal #2 PCB Waste Disposal. October 19, 1987.</p> <p>Letter to Russ Korvola, Port of Portland, Subject: Waste Paint Sampling and Disposal at Terminals 2 and 6. September 5, 1989.</p> <p>Letter to Gary Kanz, Port of Portland regarding Hazardous Waste Manifest. April 5, 1990.</p> <p>Letter Report to Charles Grey, Hillsboro Landfill, Subject: Approval of Non-Hazardous Solid Waste for Acceptance by Hillsboro Landfill. December 12, 1994.</p>

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
		<p>Waste Manifest Continuation Sheet for Manifest Doc. No. 299247. November 3, 1998.</p> <p>Letter to Gerald S. Gum, Port of Portland, Ref: Purchase Order #U000301 - Project No. 51241-657 (Certificate of Disposal for 2 Non-PCB Transformers).October 20, 1993.</p>
c. any person subleasing land, equipment or space on the Property;	See response to Question 6 (f), (g) and (h).	
d. utilities, pipelines, railroads and any other person with activities and/or easements regarding the Property;	<ul style="list-style-type: none"> • Pacific Northwest Bell (now Qwest) – holds an easement across the property to place, construct, maintain, inspect, reconstruct, repair, replace, remove and keep obstacles clear from underground communication lines, conduit system, manholes, and above ground cabinets. • Northern Pacific Railway Company – held an industrial track agreement for construction, maintenance, and operation of certain railroad spur tracks • City of Portland – water and sewer • Waste Management, Inc. – municipal waste • Northwest Natural – natural gas • Portland General Electric – electricity • Portland Terminal Railroad – switching company • Union Pacific Railroad – steel rail cargo • Burlington Northern Santa Fe Railroad – steel rail cargo 	<p>See agreements and contracts at Tab 1. See deeds and easements at Tab 2.</p> <p>See property transaction records at Tab 5, specifically:</p> <p>URS Corporation. 2001. Final Report, Phase I Environmental Site Assessment, Terminal 2 - Port of Portland, Portland, Oregon. Prepared for Stevedoring Services of America. January 2001.</p>
e. major financiers and lenders;	Not applicable.	
<p>f. any person who exercised actual control over any activities or operations on the Property;</p> <p>g. any person who held significant authority to control any activities or operations on the Property;</p> <p>h. any person who had a significant presence or who conducted significant activities at the Property; and</p>	<p>The Port is the current owner of the Terminal 2 property. The following entities held leases, subleases, permits and rights-of-entry, or utilized yard space or the dock/warehouse facilities, exercised or had the authority to exercise control over the activities and operations, and/or had a significant presence or conducted significant activities during the Port's ownership (1971-present). Note that time periods of involvement could be more expansive; dates are based on best available information at this time.</p> <ol style="list-style-type: none"> 1. Alexander Gow, Inc. (1999-present) 2. Algirdas Contracting Inc. (2005) 3. APL Logistics Americas, LTD. (2005-present) 4. AWC Port Services, Inc. (1997) 5. Balfour Guthrie & Co. Ltd. (1976) 6. (b) (6) (2004-2005) 7. BHP International Marine Transport, Inc. (1993-1996) 8. Bingham Willamette Company (a division of Guy F. Atkinson) (1965-1976) 9. Brady-Hamilton Stevedore Co. (now SSA; early 1970s to present) 10. Burlington Northern Santa Fe (BNSF) Railroad (present; dates not yet confirmed) 	<p>See agreements and contracts at Tab 1.</p> <p>See site investigation records at Tab 6, specifically:</p> <p>Port of Portland. 2000. Preliminary Assessment, Port of Portland, Terminal 2, 3556 NW Front Avenue, Portland, Oregon, 97210. August 29, 2000.</p>

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
	<ul style="list-style-type: none"> 11. City of Portland (1995) 12. Crowley Marine Services (~1990-2000) 13. Gulf & Atlantic Maritime Services, Inc. (1997-1998) 14. Heemskirk Canada Limited. (2006-2007) 15. Hoegh Lines Agencies, Inc. (1990) 16. IMT Agencies (dba Hoegh Lines Agencies, Inc.) (1992-1994) 17. International Raw Materials Ltd. (2007-2008) 18. Interocean Steamship corporation (1992-1993) 19. Jones Oregon Stevedoring Company (early 1970s to present) 20. Kinder Morgan Bulk Terminals (2007) 21. Lane Bryant Oregon Inc. (1975) 22. Marine Transport Service, Inc. (1980-1981) 23. Max J. Kuney Company (2007) 24. Medbulk Maritime Corp (1997) 25. National Cargo Bureau, Inc. (1994-1999 and 2004-present) 26. New York Merchandise Co. (1974-1979) 27. Northern Pacific Railway Company (1969-present) 28. Pacific Maritime Association (1999-present) 29. Pacific Northwest Bell (now Qwest) (1991-present) 30. Philippines, Micronesia & Orient Navigation Company (1999-2005) 31. Portland Recycling (1980-1983) 32. Portland Terminal Railroad (1969-present) 33. Power Barge Corporation (2005-2007) 34. PS Trucking, Inc. (2007) 35. Puget Sound Tug & Barge Company (dba Hawaiian Marine Lines) (1988-1992) 36. Regional Maritime Security Coalition – Columbia River (2002-2003; 2005-2006) 37. Sause Bros. Ocean-Towing Co., Inc. (1993-2001) 38. Star Shipping (2000) 39. Star Shipping (1988-1995) 40. Stevedoring Services of America, Inc. (SSA) (dba Brady Hamilton Stevedore Company) (1985-present) 41. Union Pacific Railroad (present; dates not yet confirmed) 42. U.S. Army Corps of Engineers (2008-present) 43. U.S. Customs (2000) 44. Washington County Sheriff's Office (2005-2006) 45. Western Transportation Co. (1974) 46. Willamette Iron and Steel Company (Guy F. Atkinson Company) (1947-1983) 47. Yokota International, Inc. (1999-2005) 	
i. government entities that had proprietary (as opposed to regulatory) interest or involvement with regard to the activity on the Property.	<p>Since the Port's acquisition of the Terminal 2 property in 1971, the following government entities had proprietary interest or involvement in the property:</p> <p>City of Portland U.S. Army Corp of Engineers</p>	See agreements and contracts at Tab1.

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
	U.S. Customs Washington County Sheriff's Office	
7. Identify and describe any legal or equitable interest that you now have, or previously had in each Property. Include information regarding the nature of such interest: when, how, and from whom such interest was obtained; and when, how, and to whom such interest was conveyed, if applicable. In addition, submit copies of all instruments evidencing the acquisition or conveyance of such interest (e.g., deeds, leases, purchase and sale agreements, partnership agreements, etc.).	The Port acquired certain property and improvements within what is now the Terminal 2 property from the City of Portland Commission of Public Docks (City CPD) effective January 1, 1971. The Port acquired certain filled land above the line of ordinary high water from the State Land Board under the 1987 Settlement with DSL.	See CPD bargain and sale deed at Tab 2 of the Port's 104(e) response for Terminal 1 North, submitted to EPA on July 16, 2008. See DSL Settlement and Mutual Release at Tab 1 of the Port's 104(e) response for Terminal 1 South, submitted to EPA and dated August 16, 2008.
8. If you are the current owner and/or current operator, did you acquire or operate the Property or any portion of the Property after the disposal or placement of hazardous substances, waste, or materials on, or at the Property? Describe all of the facts on which you base the answer to this question.	The historical documents relating to the Port's acquisition of the Terminal 2 property from the City CPD do not indicate the Port had prior knowledge or reason to know that any hazardous substance, waste, or material was disposed of on, or at the property. The acquisition of Terminal 2 was performed pursuant to State legislation, a vote by the citizens of Multnomah, Clackamas and Washington Counties, a City of Portland Ordinance, and action by the Port Commission, based on the determination that it was in the best interest of the people to consolidate public dock ownership within one government entity, from the City to the Port.	See CPD bargain and sale deed at Tab 2 of the Port's 104(e) response for Terminal 1 North, submitted to EPA on July 16, 2008. See ORS 778.020; City Ordinance No. 131957; and Election and Port Commission Documents in Tab 8 of the Port's 104(e) response for Terminal 1 North, submitted to EPA and dated July 16, 2008.
9. At the time you acquired or operated the Property, did you know or have reason to know that any hazardous substance, waste, or material was disposed of on, or at the Property? Describe all investigations of the Property you undertook prior to acquiring the Property and all of the facts on which you base the answer to this question.	No. See response to Question 8 above.	
10. Identify all prior owners that you are aware of for each Property identified in Response to Question 4 above including, but not limited to, the following entities believed to have owned one or more of your Properties: a. City of Portland b. Freightliner LLC c. Oregon Shipbuilding Corporation d. Shipyard Commerce Center LLC e. Union Pacific Railroad; and f. West Coast Terminal Company For each prior owner, further identify, if known and if relevant, and provide copies of any documents you may	Former owners of the Terminal 2 property include: <ul style="list-style-type: none"> • City of Portland, Commission of Public Docks (1949-1971 and 1953-1971) • Dad's Root Beer Bottling Company (<1951) • Gladding McBean (<1927) • North Pacific Lumber Company (~1901-1919) • Oregon Terminals Company (1927-1953) • Private Real Estate Syndicate [J.O. Elrod] (1919-1927) • State of Oregon (1859-1987) • United States Government (RFC, DPC and WAA) (1941-1949) • Willamette Iron and Steel Company [WISCO] (<1949) 	See deeds and easements at Tab 2. See property transaction records at Tab 5, specifically: Letter to Ned Smith (Commission of Public Docks) regarding Tax Lot 63, Section 28 - T1N R 1 E WM (Appraisal 3100 NW Front Avenue). January 31, 1966. See site investigation records at Tab 6,

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
<p>have regarding:</p> <ul style="list-style-type: none"> i. the dates of ownership ii. all evidence showing that they controlled access to the Property; and iii. all evidence that a hazardous substance, pollutant, or contaminant, was released or threatened to be released at the Property during the period that they owned the Property. 	<ul style="list-style-type: none"> • Zidell Realty Company (1951-1966) <p>None of the entities listed in bullets (a) through (f) Question 10 previously owned the Terminal 2 property, except for the City of Portland (1949-1971 and 1953-1971). Although not reflected in the deeds, the West Coast Terminal Company listed in bullet (f) is affiliated with Oregon Terminals Company, a prior owner of the property from ~1927 to 1953. See response to Question 11.</p> <p>Periods of ownership are reflected by those deeds that are available and which are attached at Tab 2.</p>	<p>specifically:</p> <p>Port of Portland. 2000. Preliminary Assessment, Port of Portland, Terminal 2, 3556 NW Front Avenue, Portland, Oregon, 97210. August 29, 2000.</p> <p>Hahn and Associates, Inc. 2005. A Phase I Environmental Site Assessment, Volume I, Approximate 52.03-acre Port of Portland Terminal 2 Property, 3074-3576 NW Front Avenue, Portland, Oregon. Prepared for the Port of Portland. May 31, 2005.</p>
<p>11. Identify all current or prior operators of the Property, including lessors, you are aware of for each Property identified in response to Question 4 above including, but not limited to, the following entities:</p> <ul style="list-style-type: none"> a. Beall Pipe, Inc.; b. Benson Industries, Inc.; c. Cargill, Inc.; d. Cascade General; e. Cascade West; f. Chevron USA; g. Classical Chinese Garden Trust; h. Hunt Foods, Inc.; i. Kaiser; j. Multnomah County Sheriff's Office; k. Pacific Molasses Company; l. Pacific Pine; m. Port of Cascade Locks.; n. Portland Municipal Airport; o. Safety Kleen; p. Shaver Transportation Company; q. Speed Towing; r. St. John Auto Wrecking Yard; s. Thermo Pressed Laminates, Inc.; t. Tristar Transload, Inc.; u. U.S. Maritime Commission; v. Ultraboard; w. War Assets Administration; x. West Coast Paper Company; y. Western Transportation.; and z. Willamette Iron and Steel Corporation. <p>For each such operator, further identify, if known and if relevant, and provide copies of any documents you may have regarding:</p>	<p>Historical operations at the Terminal 2 property have generally included export of agricultural and manufactured wood products, import of automobiles, loading/unloading and storage of break bulk lumber, plywood pulp and bulk paper products, and some limited outfitting and repair of ships. Currently, tenant operations involve loading and unloading of products (e.g., urea and steel rail) from vessels, railcars and trucks.</p> <p>Of the entities listed in (a) through (z) of Question 11, only the War Assets Administration, Western Transportation and Willamette Iron and Steel Corporation are known to have been prior operators of the Terminal 2 property, as explained below. Note that time periods of involvement could be more expansive; dates are based on best available information at this time.</p> <ol style="list-style-type: none"> 1. Albina Engine and Machine <ul style="list-style-type: none"> i. 1947 ii. Albina Engine and Machine leased repair facilities from the United States within what was known as Plancor 772. iii. Phase I ESA (Hahn, 2005) iv. No documented evidence of releases was identified. 2. Alexander Gow, Inc. <ul style="list-style-type: none"> i. 1999 to present ii. Leased office space in the Terminal 2 Administration building for administrative purposes. iii. Port lease files iv. No documented evidence of releases was identified. 3. Algirdas Contracting Inc. <ul style="list-style-type: none"> i. 2005 ii. Held permit and right-of-entry for activities related to a crane removal at Berth 203. iii. Port lease files iv. No documented evidence of releases was identified. 4. APL Logistics Americas, LTD. <ul style="list-style-type: none"> i. 2005 to present 	<p>See agreements and contracts at Tab 1.</p> <p>See deeds and easements at Tab 2.</p> <p>See property transaction records at Tab 5, specifically:</p> <p>Hart Crowser. 1991. Environmental Assessment Report, Marine Terminal 2, Portland, Oregon. Prepared for the Port of Portland. August 7, 1991.</p> <p>Letter to (b) (6) regarding Rose Festival Float (Formal Notice to Remove Float Within 30 Days).</p> <p>Hahn and Associates, Inc. 2005. A Phase I Environmental Site Assessment, Volume I, Approximate 52.03-acre Port of Portland Terminal 2 Property, 3074-3576 NW Front Avenue, Portland, Oregon. Prepared for the Port of Portland. May 31, 2005.</p> <p>Letter regarding Appraisal of 3100 NW Front (Former Zidell Building). January 31, 1966.</p> <p>Letter from City of Portland Fire Bureau regarding Retaining City Property for Fire Boat.</p>

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
<p>i. the dates of operation; ii. the nature of prior operations at the property; iii. all evidence that they controlled access to the property; and iv. all evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at or from the Property during the period that they operated on the Property.</p>	<p>ii. Leased office space in the Terminal 2 Administration building for administrative purposes. iii. Port lease files iv. No documented evidence of releases was identified.</p> <p>5. Arrow Pet Supply i. At least 1964-1966 ii. Held a 10-year lease with Zidell Realty Company for the Zidell Building iii. Appraisal for 3100 NW Front Avenue iv. No documented evidence of releases was identified.</p> <p>6. AWC Port Services, Inc. i. 1996-1997 ii. Leased area in the Terminal 2 Administration Building for use as a training center. iii. Port lease files iv. No documented evidence of releases was identified.</p> <p>7. Balfour Guthrie & Co. Ltd. i. 1976 ii. Leased dock office in House 205 for office space to coordinate vessel calls. iii. Port lease files iv. No documented evidence of releases was identified.</p> <p>8. (b) (6) i. 2004-2005 ii. Stored Rose Festival float under verbal agreement with SSA iii. Letter to (b) (6) dated March 22, 2005. iv. No documented evidence of releases was identified.</p> <p>9. BHP International Marine Transport, Inc. i. 1993-1996 ii. Held terminal use agreement for use of docks and berths and back-up areas adjacent to the docks for cargo handling. The Use Agreement specified areas were designated by the Terminal operator (SSA). iii. Port lease files iv. No documented evidence of releases was identified.</p> <p>10. Bingham-Willamette Company (a division of Guy F. Atkinson) i. 1965-1976 ii. Leased Gearlocker area for unspecified activities. Bingham-Willamette acquired 2.93 acres of former Terminal 2 property from the Port in 1978 (see response to Question 4 (d) above). iii. City CPD records; Port lease files iv. No documented evidence of releases was identified.</p> <p>11. Brady-Hamilton Stevedore Co. (became SSA circa 1982) i. Early 1970s to present ii. Performed stevedoring services (loading/unloading) at the terminal. iii. Interviews with Port personnel iv. No documented evidence of releases was identified.</p> <p>12. Burlington Northern Santa Fe (BNSF) Railroad i. Presently operating (dates not yet confirmed)</p>	<p>December 3, 1970.</p> <p>Memo to A.W. Binns, Commission of Public Docks regarding Investigation of WISCO Lease Area. February 6, 1958.</p> <p>Letter to Willamette Iron and Steel Company Attention: Lew Hallmark regarding Damages from Sandblasting Operations. September 9, 1969.</p> <p>See site investigation records at Tab 6, specifically:</p> <p>Port of Portland. 2000. Preliminary Assessment, Port of Portland, Terminal 2, 3556 NW Front Avenue, Portland, Oregon, 97210. August 29, 2000.</p> <p>Ash Creek Associates, Inc./NewFields. 2007. Revised Stormwater Evaluation Work Plan. December 2007.</p> <p>See other environmental records at Tab 7, specifically:</p> <p>Pollution Control Plan for Sauvie Island Bridge Span Assembly at Terminal 2. January 4, 2007.</p> <p>E-mail to Quentin Pitts, Port of Portland, regarding T2: Barite Stockpile and Housekeeping. February 8, 2007</p> <p>E-mail to Quentin Pitts, Port of Portland, regarding T2: Urea Residue in Warehouse 205. January 19, 2007.</p> <p>E-mail to Quentin Pitts, Port of Portland regarding T2: Port of Portland-Bridge Assembly Site. February 23, 2007.</p> <p>E-mail to Quentin Pitts, Port of Portland, regarding T2: Barite Housekeeping. March 26,</p>

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
	<ul style="list-style-type: none"> ii. Transports steel rail from Terminal 2 iii. Interviews with Port personnel iv. No documented evidence of releases was identified. <p>13. City of Portland</p> <ul style="list-style-type: none"> i. & ii. Owned and operated the Terminal 2 property from 1949-1971 and 1953-1971. Activities that occurred on the Terminal 2 property during City CPD ownership included cargo handling and storage, property management, fireboat moorage, maintenance dredging, and leasing areas to tenants. The City Bureau of Fire also moored its fireboat in the cove north of Terminal 2 in at least 1970, and later set up a more permanent moorage area in that location in 1995 where it is still in use. iii. Port lease files; deeds iv. No documented evidence of releases was identified. <p>14. Coastwise Line</p> <ul style="list-style-type: none"> i. 1950 ii. Leased space at the terminal for a receiving office. iii. Polk City Directories iv. No documented evidence of releases was identified. <p>15. Crowley Marine Services</p> <ul style="list-style-type: none"> i. ~1990-2000 ii. Leased space in the Terminal 2 Administration building for administrative purposes. iii. Port lease files; Polk City Directories iv. No documented evidence of releases was identified. <p>16. Dad's Root Beer Company</p> <ul style="list-style-type: none"> i. 1947-1951 ii. Leased and later purchased the former Zidell Building from the U.S. Reconstruction Finance Corporation in 1949. Available records indicate Dad's Root Beer used the building for bottling soda. Dad's Root Beer also utilized an electric gas pump, which may have been served by an underground storage tank adjacent to the building iii. Appraisal for 3100 NW Front; Phase I ESA (Hahn, 2005) iv. No documented evidence of releases was identified. <p>17. Duluth Oregon Lumber Company</p> <ul style="list-style-type: none"> i. 1925 ii. Lumber company with unspecified activities. iii. U.S. Army Corps of Engineers reports iv. No documented evidence of releases was identified. <p>18. Gladding McBean & Company</p> <ul style="list-style-type: none"> i. <1927 ii. Prior owner. Activities unknown. iii. Deeds iv. No documented evidence of releases was identified. <p>19. Gulf & Atlantic Maritime Services, Inc.</p> <ul style="list-style-type: none"> i. 1997-1998 ii. Leased office space in the Terminal 2 Administration building for administrative purposes. 	<p>2007.</p> <p>Letter to Brett Hulstrom, City of Portland Bureau of Environmental Services regarding Industrial Wastewater Batch Discharge (Batch -2007-029). May 7, 2007.</p> <p>Letter Report to Russ Korvola, Port of Portland regarding Response to Oil Spill on Willamette River, Marine Terminal 2, Port of Portland, Portland, Oregon. December 9, 1992</p> <p>Marine Security Report of Damage regarding Terminal 2 Forklift No. 27753 Hydraulic Leak. June 17, 1993.</p>

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
	<ul style="list-style-type: none"> iii. Port lease files iv. No documented evidence of releases was identified. <p>20. Guy F. Atkinson Company</p> <ul style="list-style-type: none"> i. 1950-1971 ii. Held lease agreement in 1950 for portions of Terminal 2 including docks, trackage for railcar movement, and certain areas for construction and repair of vessels and for production of steel and metal components. The agreement also conveyed ownership of Substations 1 and 3 to WISCO and covered use of electrical circuits that connected to the former Substations 1 and 3. Guy F. Atkinson entered into a 10-yr lease with the City CPD from 1965 to 1975 for the construction and repair of vessels and components and production and storage of steel and metal items on the southeasterly most 3.35-acres of what was then Terminal 2 property. This lease was subsequently amended by the Port on April 7, 1976 for a 5-year term. In 1978, however, the Port sold 2.93 of the 3.35 acres to Bingham-Willamette Company, which effectively altered the amended 1976 lease between the Port and Guy F. Atkinson. A new lease with WISCO (a division of Guy F. Atkinson) was established on August 9, 1978 for the use of the remaining 0.42-acre for ship berth moorage near Berth 206. iii. City CPD records; Port lease files iv. No documented evidence of releases was identified. <p>21. Heemskirk Canada Limited</p> <ul style="list-style-type: none"> i. 2006-2007 ii. Held terminal use agreement for import of barium sulphate. iii. Port lease files iv. No documented evidence of releases was identified. <p>22. Hoegh Lines Agencies, Inc.</p> <ul style="list-style-type: none"> i. 1990 ii. Leased office space located in the Terminal 2 Administration Building for administrative purposes. iii. Port lease files iv. No documented evidence of releases was identified. <p>23. IMT Agencies (dba Hoegh Lines Agencies, Inc.)</p> <ul style="list-style-type: none"> i. 1992-1994 ii. Leased office space located in the Terminal 2 Administration Building for administrative purposes. iii. Port lease files iv. No documented evidence of releases was identified. <p>24. International Raw Materials Ltd.</p> <ul style="list-style-type: none"> i. 2007 to present ii. Holds terminal use agreement for importing urea. The urea is unloaded from vessels and temporarily stored in Warehouse 205 prior to being loaded into railroad cars, trucks or barges for delivery. iii. Port lease files; interviews with Port personnel iv. During a site inspection in 2007, Port staff observed urea residue tracked inside Warehouse 205 from vehicles parking in the warehouse. Terminal management was notified and the warehouse 	

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
	<p>was closed off to vehicle traffic and subsequently cleaned.</p> <p>25. Interocean Steamship Corporation</p> <ul style="list-style-type: none"> i. 1992-1993 ii. Leased office space in the Terminal 2 Administration Building for administrative purposes. iii. Port lease files iv. No documented evidence of releases was identified. <p>26. Jones Oregon Stevedoring Company</p> <ul style="list-style-type: none"> i. Early 1970s to present ii. Leased office space in House 205 for administrative purposes and performs stevedoring services (loading/unloading) at the Terminal. iii. Port lease files; interviews with Port personnel iv. No documented evidence of releases was identified. <p>27. Kinder Morgan Bulk Terminals</p> <ul style="list-style-type: none"> i. 2007 ii. Performed stevedoring (loading and unloading) of barite from vessels for Heemskirk under their terminal use agreement iii. Port lease files; interviews with Port personnel iv. On 2/8/2007 and 3/26/2007, issues with barite dust control were identified where the dust was potentially reaching storm drains at the property. The Port notified Kinder Morgan management and requested they immediately address the issue. <p>28. Lane Bryant Oregon Inc.</p> <ul style="list-style-type: none"> i. 1975 ii. Held space rental agreement for storage at Warehouse 201. iii. Port lease files iv. No documented evidence of releases was identified. <p>29. Marine Transport Service</p> <ul style="list-style-type: none"> i. 1980-1981 ii. Leased office space in House 201 for administrative purposes. iii. Port lease files iv. No documented evidence of releases was identified. <p>30. Max J. Kuney Company</p> <ul style="list-style-type: none"> i. 2007 ii. Leased yard and dock space for storage of materials and components related to the assembly of the new Sauvie Island Bridge. Assemblage of the bridge components included limited welding and painting activities. iii. Port lease files iv. During a site walkthrough on February 22, 2007, Port staff observed a sheen on the ground emanating from beneath a crane that was being erected by Kuney in the vicinity of Warehouse 203. Following discussion with on-site workers, the area was cleaned up and precautionary measures were instituted. There was no indication the material reached the river. <p>31. Medbulk Maritime Corp.</p> <ul style="list-style-type: none"> i. 1997 ii. Used terminal for staging forestry products and general cargo operations 	

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
	<ul style="list-style-type: none"> iii. Port lease files iv. No documented evidence of releases was identified. <p>32. Miesen Fuel Co.</p> <ul style="list-style-type: none"> i. 1939 ii. Prior operator; activities unknown, but likely sold wood products for fuel. iii. Phase I ESA (Hahn, 2005) iv. No documented evidence of releases was identified. <p>33. National Cargo Bureau, Inc.</p> <ul style="list-style-type: none"> i. 1994-1999 and 2005 to present ii. Leased office space at the Terminal 2 Administration Building for administrative purposes. iii. Port lease files; Phase I ESA (Hahn, 2005) iv. No documented evidence of releases was identified. <p>34. New York Merchandise Co.</p> <ul style="list-style-type: none"> i. 1974-1979 ii. Held space rental agreement for area at Berth 201 iii. Port lease files iv. No documented evidence of releases was identified. <p>35. North Pacific Lumber Co. (also referred to as North Pacific Lumber & Manufacturing)</p> <ul style="list-style-type: none"> i. 1901-1919 and 1961 ii. Prior owner from 1901 to 1919; operated a sawmill on or near what is now the western corner of the property. In 1961, held a space rental agreement with the City CPD for storage of lumber. iii. City CPD records; Phase I ESA (Hahn, 2005); Sanborn Fire Insurance maps iv. No documented evidence of releases was identified. <p>36. Northern Pacific Railway Company (now Portland Terminal Railroad)</p> <ul style="list-style-type: none"> i. 1969-present ii. Held an industrial track agreement for construction, maintenance, and operation of certain railroad spur tracks and currently conducts switching. iii. Port lease files iv. No documented evidence of releases was identified. <p>37. Oregon Terminals Inc.</p> <ul style="list-style-type: none"> i. 1927-1953 ii. Constructed and owned the Oceanic Terminal which included a warehouse and cold storage facility on what is now the northwest portion of the Terminal 2 property. Operations included the export of Oregon agricultural and manufactured wood products. iii. Deeds iv. No documented evidence of releases was identified. <p>38. Pacific Maritime Association</p> <ul style="list-style-type: none"> i. 1999 to present ii. Leases office space in the Terminal 2 Administration building for administrative. iii. Port lease files iv. No documented evidence of releases was identified. <p>39. Pacific Northwest Bell (now Qwest)</p> <ul style="list-style-type: none"> i. 1991 to present 	

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
	<ul style="list-style-type: none"> ii. Holds easement across the property for underground communication lines iii. Port legal files iv. No documented evidence of releases was identified. <p>40. Packard Motor Company</p> <ul style="list-style-type: none"> i. 1948-1956 ii. Used building at 3050 NW Front Avenue for administrative purposes iii. Phase I ESA (Hahn, 2005) iv. No documented evidence of releases was identified. <p>41. Philippines, Micronesia & Orient Navigation Company.</p> <ul style="list-style-type: none"> i. 1999-2005 ii. Leased office space in the Terminal 2 Administration building for administrative purposes. iii. Port lease files iv. No documented evidence of releases was identified. <p>42. Pope & Talbot, Inc.</p> <ul style="list-style-type: none"> i. 1949 to at least 1950 ii. Leased office space in the former WISCO building (also known as DP-20, which later became the CPD Admin Building). iii. City CPD records; Polk City Directories iv. No documented evidence of releases was identified. <p>43. Portland Recycling</p> <ul style="list-style-type: none"> i. 1980-1983 ii. Held permit and right-of-entry for use of yard space at Terminal 2 for the purpose of parking trucks and recycling boxes. iii. Port lease files iv. No documented evidence of releases was identified. <p>44. Portland Terminal Railroad (formerly Northern Pacific Railway Company)</p> <ul style="list-style-type: none"> i. 1969-present ii. Held an industrial track agreement for construction, maintenance, and operation of certain railroad spur tracks and currently conducts switching. iii. Port lease files iv. No documented evidence of releases was identified. <p>45. Power Barge Corporation</p> <ul style="list-style-type: none"> i. 2005-2007 ii. Held dockage agreement for short-term berthing of a barge iii. Port lease files iv. No documented evidence of releases was identified. <p>46. Private Real Estate Syndicate [J. Elrod]</p> <ul style="list-style-type: none"> i. 1919-1927 ii. Owner of the Oceanic Terminal property. Information regarding specific activities was not identified iii. Preliminary Assessment (Port, 2000); deeds iv. No documented evidence of releases was identified. <p>47. PS Trucking, Inc.</p>	

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
	<ul style="list-style-type: none"> i. 2007 ii. Leased office space in the Terminal 2 Administration building for administrative purposes. iii. Port lease files iv. No documented evidence of releases was identified. <p>48. Puget Sound Tug & Barge Company (dba Hawaiian Marine Lines)</p> <ul style="list-style-type: none"> i. 1988-1992 ii. Leased space in the Terminal 2 Administration building for administrative purposes. iii. Port lease files iv. No documented evidence of releases was identified. <p>49. Regional Maritime Security Coalition – Columbia River</p> <ul style="list-style-type: none"> i. 2002 to present ii. Leased office space in the Terminal 2 Administration building for administrative purposes. iii. Port lease files iv. No documented evidence of releases was identified. <p>50. Rhodia Inc.</p> <ul style="list-style-type: none"> i. 1968 ii. Leased 1,000 square feet at Terminal 2 from the City CPD for unspecified activities iii. Port lease files iv. No documented evidence of releases was identified. <p>51. Riviera Motors</p> <ul style="list-style-type: none"> i. 1951 ii. Utilized the former Zidell Building as an automotive parts warehouse. Riviera was reportedly utilized a 1,500 gallon UST and dispenser pump. iii. Phase I ESA (Hahn, 2005); City CPD records iv. No documented evidence of releases was identified. <p>52. Sause Bros. Ocean-Towing Co., Inc.</p> <ul style="list-style-type: none"> i. 1993-2001 ii. Between 1993 and 2007, Sause Bros. leased office space in the Terminal 2 Administration Building for administrative purposes and from 1995-2001, Sause had regularly scheduled vessel calls at Terminal 2 in association with its ocean barge operations iii. Port lease files iv. No documented evidence of releases was identified. <p>53. Shaw Bros. & Association</p> <ul style="list-style-type: none"> i. 1950 ii. Marine surveyors; unspecified activities at 3630 NW Front Avenue iii. Polk City Directories iv. No documented evidence of releases was identified. <p>54. Star Shipping</p> <ul style="list-style-type: none"> i. 1988-1989; 1991-2000 ii. Held terminal use agreement for loading and unloading steel and forest products, containers, and cargo. iii. Port lease files; Preliminary Assessment (Port, 2000). iv. No documented evidence of releases was identified. 	

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
	<p>55. Stevedoring Services of America, Inc. (SSA; also known Brady Hamilton Stevedore Company)</p> <ul style="list-style-type: none"> i. 1970s to present ii. SSA initially operated at Terminal 2 as Brady Hamilton Stevedore Company (see description above.) In 1985, SSA became the exclusive operator of Terminal 2 under a Terminal Management Agreement. As the terminal operator, SSA oversaw the loading and unloading of breakbulk lumber, plywood pulp, and products from vessels, railcars and trucks. SSA provided and maintained terminal operating equipment (except for cranes), and was responsible for terminal security. SSA conducted fueling and maintenance of equipment, which included work on passenger vehicles, forklifts, yard vehicles, toploaders, miscellaneous equipment and motors related to facility operations. DEQ permit applications from 1986 and 1994 indicate SSA utilized three USTs in association with its operations, including one 3,000-gallon diesel, one 10,000-gallon gasoline tank, and one 675-gallon used oil that were installed circa 1970. Maintenance activities typically occurred in or near the gearlocker building. Materials generated from maintenance activities were collected and contained for off-site disposal or recycling and SSA was responsible for complying with local, state and federal laws and regulations pursuant to its agreement. During site inspections, petroleum products, paint, antifreeze solution, grease, gear lubricant, hydraulic oil, and windshield wiper fluid were observed stored in the Gearlocker Building. SSA also utilized office space and a storage room in the Terminal 2 Administration Building for administrative purposes. <p>In 2005, SSA's management agreement was terminated and they entered into a lease agreement with the Port for reduced space at the terminal, which included space in the Gearlocker, the Gearlocker Storage Building, and office space in the Administration Building. Also at that time, SSA entered into an aboveground storage tank agreement with the Port allowing the use of ASTs containers at Terminal 2 for the purpose of storing limited materials, which included diesel, gasoline, transmission fluid, and vehicle lubricants and oils. Generally, SSA's activities since 2005 have included stevedoring and cargo delivery for rail and vessels, operation of gearlockers, storage of equipment, and administrative uses.</p> <ul style="list-style-type: none"> iii. Port lease files iv. On December 5, 1992 a leak from an SSA forklift caused hydraulic oil to be discharged into the stormwater system and created a sheen on the Willamette River. The material was cleaned up using sorbent materials. On June 17, 1993 a hydraulic valve broke on a forklift causing oil to spill on the dock at Berth 206. Sand was placed on the ground where the leak occurred to absorb the material. There was no indication the material reached the river. <p>56. Union Pacific Railroad</p> <ul style="list-style-type: none"> i. Presently operating (dates not yet confirmed) ii. Transports steel rail from Terminal 2 iii. Interviews with Port personnel iv. No documented evidence of releases was identified. <p>57. United Petroleum Corp.</p> <ul style="list-style-type: none"> i. <1955-1965 ii. Leased office space in the City CPD Administration Building iii. Phase I ESA (Hahn, 2005) 	

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
	<ul style="list-style-type: none"> iv. No documented evidence of releases was identified. 58. U.S. Army Corps of Engineers <ul style="list-style-type: none"> i. 2008 to present ii. Leased Berths 203 and 204 for the moorage of Corps dredges, and yard space for the storage of dredge and vessel support equipment, and Warehouse 203 for storage of vessel crew personal vehicles. Activities under the lease have not been initiated because site preparation has not yet been completed. iii. Port lease files; interviews with Port personnel iv. No documented evidence of releases was identified. 59. U.S. Customs <ul style="list-style-type: none"> i. 1965; 2000 ii. Leased office space in the Warehouse 205 dock office for administrative purposes. iii. Polk City Directories; Port lease files iv. No documented evidence of releases was identified. 60. U.S. Defense Plant Corporation <ul style="list-style-type: none"> i. 1941-1947 ii. A subsidiary of the Reconstruction Finance Corporation, the Defense Plant Corporation (DPC) provided capital for industrial expansion and manufacturing projects which were called "Plancors". The DPC authorized Plancor 50 at the southern portion of Terminal 2 in 1941 and Plancor 772 in 1942 for expansion of the WISCO shipbuilding facility. During that time, DPC leased and owned certain portions of the facility and equipment for the construction and repair of military vessels and assembly of locomotives. iii. Phase I ESA (Hahn, 2005) iv. No documented evidence of releases was identified. 61. U.S. Reconstruction Finance Corporation <ul style="list-style-type: none"> i. 1941-1947 ii. The Reconstruction Finance Corporation (RFC) was responsible for overseeing U.S. investment in wartime infrastructure. Through its subsidiary (DPC), RFC leased and owned certain portions of the WISCO facility (which included what is now part of Terminal 2) and equipment for the construction and repair of military vessels and assembly of locomotives. iii. Phase I ESA (Hahn, 2005) iv. No documented evidence of releases was identified. 62. U.S. War Assets Administration <ul style="list-style-type: none"> i. 1947-1949 ii. The War Assets Administration (WAA) was transferred responsibility of the Terminal 2 property from the Reconstruction Finance Corporation in 1947. The sole function of the WAA was to dispose of surplus U.S. assets, which included property and equipment. During its period of ownership, WAA continued to hold a lease with WISCO, and also entered into a lease with Dad's Root Beer Bottling Company. WAA sold a portion of what is now Terminal 2 to the City CPD in 1949. iii. Phase I ESA (Hahn, 2005) iv. No documented evidence of releases was identified. 63. Washington County Sheriff's Office 	

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
	<ul style="list-style-type: none"> i. 2005-2006 ii. Held permit and right-of-entry for use of 8.25 acres at Terminal 2 for the purpose of setting up an obstacle course for training police drivers. iii. Port lease files iv. No documented evidence of releases was identified. <p>64. West Coast Terminals Company (an affiliate of Oregon Terminal Company and J. Elrod)</p> <ul style="list-style-type: none"> i. Late 1920s to 1953 ii. Operated a warehouse and cold storage facility on what is now the northwest portion of the Terminal 2 property. Operations included the export of Oregon agricultural and manufactured wood products. iii. Phase I ESA (Hahn, 2005) iv. No documented evidence of releases was identified. <p>65. Western Transportation Company</p> <ul style="list-style-type: none"> i. 1935 to at least 1965 ii. Utilized Oceanic Terminal dock for unspecified activities. iii. Polk City Directories iv. No documented evidence of releases was identified. <p>66. Westway Petroleum Corp.</p> <ul style="list-style-type: none"> i. 1955-1965 ii. Leased office space in the City CPD Administration Building iii. Phase I ESA (Hahn, 2005) iv. No documented evidence of releases was identified. <p>67. Western Clay Manufacturing Company</p> <ul style="list-style-type: none"> i. 1901-1920s ii. Clay manufacturer iii. Phase I ESA (Hahn, 2005) iv. No documented evidence of releases was identified. <p>68. Willamette Iron and Steel Company [WISCO] (affiliated with Guy F. Atkinson Company and Bingham-Willamette)</p> <ul style="list-style-type: none"> i. 1941-1983 ii. WISCO occupied what is now Terminal 2 from 1941 to 1949 under an arrangement with the U.S. Defense Plant Corporation (DPC) to support the war effort. The DPC authorized two Plancors at the property in 1941 and 1942, respectively, for expansion of WISCO's adjacent shipyard to the south (currently Sulzer Pumps U.S. property) which WISCO used throughout the war for conversion, maintenance and repair of U.S. vessels. WISCO constructed minesweepers, minelayers, escort vessels and patrol vessels and repaired various operating vessels for the U.S. Navy. WISCO also built reciprocating engines for liberty ships for the U.S. Maritime Commission and assembled large locomotives for the Army. <p>WISCO facilities constructed at Terminal 2 included three shipways and outfitting docks with four attendant craneways, an angle furnace building, pipe shop, utility building, a painting/pickling building, and a portion of a machine shop (that only partially extended onto Terminal 2 from the adjacent WISCO property). The WISCO shipyard, which is currently</p>	

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
	<p>occupied by Sulzer Pumps U.S., included a main industrial building, coppersmith shop, an outfitting building, electrical test lab, boiler shop, steel plate storage, power house, a sandblasting shop, sheet metal shop, compressor house, pipe bending shop, electrical substations, blacksmith shop, steel plate storage, offices, compressor house, carpenter shop, warehouses, offices, and other ancillary facilities.</p> <p>Following the war, WISCO leased the "outfitting dock" for a period of seven years from the City CPD beginning in 1951, and also leased the Packard Building and Angle Furnace Building for a period of one year in 1955. As described above, Guy F. Atkinson (a WISCO affiliate) entered into a 10-yr lease with the City CPD from 1965 to 1975 for the construction and repair of vessels and components and production and storage of steel and metal items on the southeasterly most 3.35-acres of what was then Terminal 2 property. This lease was subsequently amended by the Port on April 7, 1976 for a 5-year term. In 1978, however, the Port sold 2.93 (now Sulzer Pumps U.S. property) of the 3.35 acres to Bingham-Willamette Company, which effectively altered the amended 1976 lease between the Port and Guy F. Atkinson. A new lease with WISCO (a division of Guy F. Atkinson) was established on August 9, 1978 for the use of the remaining 0.42-acre parcel for ship moorage near Berth 206. That lease terminated in 1983.</p> <p>iii. City CPD records; Port lease files; Phase I ESA (Hahn, 2005)</p> <p>iv. A letter sent to WISCO on 9/9/1969 indicated the City CPD incurred property damages from dust that had migrated from WISCO's sandblasting operations at its adjacent shipyard. No other documented evidence or other indication of releases was identified.</p> <p>69. Yokota International, Inc.</p> <p>i. 1999-2005</p> <p>ii. Leased office space at the Terminal 2 Administration Building for administrative purposes.</p> <p>iii. Port lease files</p> <p>iv. No documented evidence of releases was identified.</p> <p>70. Zidell Realty Company</p> <p>i. 1951-1966</p> <p>ii. Owner of building identified as 3160 NW Front Avenue</p> <p>iii. Appraisal for 3100 NW Front Avenue; City CPD records</p> <p>iv. No documented evidence of releases was identified.</p>	
<p>12. If not included in response to any of the previous questions, please describe the purpose and duration of each aquatic lands lease Respondent or the operator of Respondent's Property(ies) ever obtained from the State of Oregon and provide a copy of each application for and aquatic lands lease obtained.</p>	<p>Not applicable.</p>	
<p>Section 3.0 - Description of Each Property</p>		
<p>13. Provide the following information about each Property identified in response to Question 4:</p>	<p>See response to bullets (a) through (m) below.</p>	

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
a. property boundaries, including a written legal description;	A legal description of the Terminal 2 property is included in certain deeds for the property and the 1987 DSL settlement. Copies of the deeds are located in Tab 2.	See DSL Settlement and Mutual Release at Tab 1 of the Port's 104(e) response for Terminal 1 South, submitted to EPA and dated August 16, 2008. See deeds and easements at Tab 2.
b. location of underground utilities (telephone, electrical, sewer, water main, etc.);	The location of utilities at the Terminal 2 property are depicted in utility drawings and included in Tab 3. See also Attachment A of the Preliminary Assessment (Port, 2000). In 2008, the U.S. Army Corps of Engineers entered into a lease agreement with the Port for a portion of the Terminal 2 property. In anticipation of its tenancy, modifications are being made to the utilities and infrastructure to serve the Corps' operations. See response to Question 6 (d) for utility easement information.	See drawings and maps at Tab 3. See property transaction records at Tab 5. See site investigation records at Tab 6, specifically: Port of Portland. 2000. Preliminary Assessment, Port of Portland, Terminal 2, 3556 NW Front Avenue, Portland, Oregon, 97210. August 29, 2000.
c. location of all underground pipelines whether or not owned, controlled or operated by you;	Underground pipelines associated with water lines, sanitary sewer and storm systems are described in response to Question 13 (b) above and contained in drawings and maps at Tab 3.	See drawings and maps at Tab 3.
d. surface structures (e.g., buildings, tanks, pipelines, etc.);	The Terminal 2 property is currently developed with four warehouses, a gearlocker building, a gearlocker storage building, an administration building, a dock office, electrician's shop trailer, and a guard house. The property also has two mobile cranes and three aboveground storage tanks (ASTs) that are equipped with secondary containment and leak detection systems. A detailed history of the construction and removal of surface structures at the Terminal 2 property is included in response to Question 13 (k).	See property transaction records at Tab 5, specifically: Hahn and Associates, Inc. 2005. A Phase I Environmental Site Assessment, Volume I, Approximate 52.03-acre Port of Portland Terminal 2 Property, 3074-3576 NW Front Avenue, Portland, Oregon. Prepared for the Port of Portland. May 31, 2005.
e. over-water structures (e.g., piers, docks, cranes, etc.);	Currently, over-water structures at the Terminal 2 property include four berths (Berths 203 through 206). Two of the berths have cranes for regular ship calls, one berth is dedicated to roll on-roll off activities, and there is a low-level barge dock. Additional information on the history of the construction and removal of over-water structures is included in response to Question 13 (k).	See site investigation records at Tab 6, specifically: Port of Portland. 2000. Preliminary Assessment, Port of Portland, Terminal 2, 3556 NW Front Avenue, Portland, Oregon, 97210. August 29, 2000.
f. dry wells;	No known drywells currently exist or existed historically at the Terminal 2 property.	

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
g. treatment or control devices (e.g., surface water, air, groundwater, Resource Conservation and Recovery Act (RCRA), Transfer, Storage, or Disposal (TSD), etc.);	No records were identified that indicate treatment or control devices existed at the Terminal 2 property.	
h. groundwater wells, including drilling logs;	Oregon Water Resources Department (OWRD) records indicated that a groundwater monitoring well was installed on the property in April 2001 and was abandoned by grouting in place in February 2002. No additional information regarding the well's use was identified.	See property transaction records at Tab 5, specifically: Hahn and Associates, Inc. 2005. A Phase I Environmental Site Assessment, Volume I, Approximate 52.03-acre Port of Portland Terminal 2 Property, 3074-3576 NW Front Avenue, Portland, Oregon. Prepared for the Port of Portland. May 31, 2005.
i. storm water drainage system, and sanitary sewer system, past and present, including septic tank(s) and where, when and how such systems are emptied and maintained;	<p><u>Stormwater</u> Stormwater discharges are permitted under the Port's National Pollutant Discharge Elimination System (NPDES) Oregon Department of Environmental Quality (DEQ) Municipal Separate Storm Sewer System (MS4) Discharge Permit No. 101314, the Port's NPDES 1200-Z General Industrial Storm Water Permit, and SSA's NPDES 1200-Z General Industrial Storm Water Permit .</p> <p>Surface water runoff is conveyed to the Willamette River through a network of roof drains, catch basins, trench drains, and piping connected to two separate outfalls at the Terminal 2 property. Additionally, there are a number of flow-through type "dock drains" that traverse the crane rails and drain small, discrete areas directly to the Willamette River. The Port cleans catch basins annually. The catch basins at Terminal 2 were last cleaned in November and December 2007.</p> <p>The following provides a summary of the two storm water drainage basins at Terminal 2. Further details are provided in the enclosed references.</p> <p><u>Basin A</u> The drainage area for Basin A encompasses approximately the northern 1/3 of Terminal 2 and the leasehold area for SSA. Basin A drains to Outfall A, which subsequently discharges into the Fireboat Cove beneath Berth 203. The only pervious areas in Basin A include landscaped areas around the Administration Building and the rip-rapped slope adjacent to Warehouse 203.</p> <p><u>Basin B</u> Basin B contains connected Warehouses 204 and 206, Warehouse 205, the guard house, the electric shop, SSA Gearlocker Storage Building, SSA Gearlocker Maintenance Building, and modular trailers for office and storage uses. Basin B drains to Outfall B, which subsequently discharges to the Willamette River at the approximate location of the Basin A/Basin B divide.</p> <p><u>Sanitary Sewer</u></p>	<p>See property transaction records at Tab 5, specifically:</p> <p>Hahn and Associates, Inc. 2005. A Phase I Environmental Site Assessment, Volume I, Approximate 52.03-acre Port of Portland Terminal 2 Property, 3074-3576 NW Front Avenue, Portland, Oregon. Prepared for the Port of Portland. May 31, 2005.</p> <p>URS Corporation. 2001. Final Report, Phase I Environmental Site Assessment, Terminal 2 - Port of Portland, Portland, Oregon. Prepared for Stevedoring Services of America. January 2001.</p> <p>See site investigation records at Tab 6, specifically:</p> <p>Port of Portland. 2000. Preliminary Assessment, Port of Portland, Terminal 2, 3556 NW Front Avenue, Portland, Oregon, 97210. August 29, 2000.</p> <p>Ash Creek Associates, Inc./NewFields. 2007. Revised Stormwater Evaluation Work Plan. December 2007.</p> <p>See other environmental records at Tab 7 for</p>

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
	<p>According to as-built sewer diagrams, sanitary sewage from the property (which includes all floor drains, utility sinks, kitchens, and restrooms in the buildings) is connected to the City of Portland's sanitary sewer system. In addition, drains collecting runoff from the concrete fueling pad in the vicinity of the gasoline and diesel ASTs and the steam-cleaning pad (further discussed below) are directed to an oil-water separator that discharges to the City of Portland sanitary sewer.</p> <p>Steam Cleaning Facility A steam cleaning facility was constructed in 1983 near the Gearlocker Building for SSA for the purpose of cleaning vehicles and equipment. The entire steam cleaning facility is bermed with curbs and there are 4-ft sidewalls attached to the curbing to prevent overspray. The surface area in the facility is sloped and directs surface water to a trench drain which then drains to a sump. The water flows through an oil-water separator in the sump prior to going into the City's sanitary sewer system. The sump is pumped out on an as-needed basis depending on how often the steam cleaning facility is used.</p> <p>The City of Portland issued a permit to the Port in 1983 (Permit #400-2) to allow discharge from the oil-water separator to the sanitary sewer. Under the management agreement, SSA operated the steam cleaning facility and oil water separator, and was responsible to comply with all terms and conditions of the City-Port permit. The permit expired in 1994 and SSA has had responsibility for permitting the steam cleaning facility since that time.</p> <p>Other Industrial Discharge to Sanitary In 2007, the City of Portland issued Kinder Morgan, a tenant of the Terminal 2 property, a project-specific industrial wastewater batch discharge permit (Batch-2007-028). This permit allowed the discharge of 12,000 gallons of wash down water from barite unloading activities into the City's sanitary sewer system.</p>	<p>permit information.</p>
<p>j. subsurface disposal field(s), Underground Injection Control (UIC) wells, and other underground structures (e.g., underground storage tanks (USTs); and where they are located, if they are still used, and how they were closed; including, but not limited to, the tanks associated with the St. Johns Auto Wrecking Yard;</p>	<p>SSA permitted and utilized three USTs during its management of Terminal 2:</p> <ul style="list-style-type: none"> • 1,500-gallon used oil (originally estimated in the permit application as 675-gallon); installed 1979 • 2,750-gallon diesel (originally estimated in the permit application as 3,000-gallon); installed 1971 • 5,500-gallon gasoline (originally estimated in the permit application as 10,000-gallon); installed 1979 <p>In 1997, the Port initiated decommissioning of the three USTs. The tanks were removed by Hart Crowser between December 9 through 16, 1997. As part of the decommissioning activities, the UST fuel types, storage capacities and installation dates were confirmed as described above. Additional details on the location and removal of these USTs is included in the 1998 Decommission Report, as well as responses to Questions 26 and 64.</p> <p>During the course of conducting a Phase I ESA in 2005, Hahn and Associates identified information that indicated three additional historical USTs may have existed east of the former Zidell Building during the City CPD's ownership (currently the vicinity of the gearlocker compound). The presence of these possible USTs was based on a review of City CPD and Port plot plans, which indicated the tanks were in use between 1959 and the</p>	<p>See property transaction records at Tab 5, specifically:</p> <p>Hahn and Associates, Inc. 2005. A Phase I Environmental Site Assessment, Volume I, Approximate 52.03-acre Port of Portland Terminal 2 Property, 3074-3576 NW Front Avenue, Portland, Oregon. Prepared for the Port of Portland. May 31, 2005.</p> <p>Port of Portland. 2007. Memo from Sara Moore to File regarding Historical USTs in the Vicinity of the former Zidell Building at Terminal 2. June 21, 2007.</p> <p>See site investigation records at Tab 6, specifically:</p>

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
	<p>1970s. A subsequent evaluation of Port and City CPD records on the three possible USTs revealed the three historical tanks were likely removed around 1970 and 1971. Construction development plans dated 1971 specifically identified two of the tanks for removal. The third tank was in the same general area, which underwent extensive redevelopment including the demolition of structures and building foundation in the area of the third tank. Post-1970 drawings no longer identified the presence of the third tank.</p> <p>Available records did not indicate the presence of UICs or other subsurface disposal mechanisms at the Terminal 2 property.</p>	<p>Port of Portland. 2000. Preliminary Assessment, Port of Portland, Terminal 2, 3556 NW Front Avenue, Portland, Oregon, 97210. August 29, 2000.</p> <p>E-mail to Kristi Maitland, Port of Portland, regarding T2. March 9, 2005.</p> <p>Notification for Underground Storage Tanks for Terminal 2. March 31, 1986.</p> <p>Letter to Fay Malloy, Port of Portland regarding Regulatory Compliance Status of Port-owned Underground Storage Tank System at the Terminal 2 Facility, Portland, Oregon. July 28, 1993.</p> <p>Memo to Stan Jones, Port of Portland regarding T2 USTs 1, 2 and 3. August 8, 1996.</p>
<p>k. any and all major additions, demolitions or changes on, under or about the Property, its physical structures or to the Property itself (e.g., stormwater drainage, excavation work); and any planned additions, demolitions or other changes to the Property;</p>	<p>Historically, the northwestern portion of Terminal 2 was occupied by a portion of the North Pacific Lumber Company facility from the late 1800s until 1919. In the late 1920s, the northwestern portion of the property was partially filled and converted to a marine terminal by West Coast Terminal Company. Referred to as the Oceanic Terminal, the facility included a U-shaped warehouse and cold storage facility, and was served by three ship berths.</p> <p>The southern portion of the property was initially developed in the early 1920s with a clay manufacturing operation and a sawmill. During the 1930s, the southeastern portion of the property included a small dock area. A review of building permits for the property indicated a 1936 permit for the construction of an office/shop, and 1939 permits for the construction of a saw shed and wood bins.</p> <p>Beginning in 1941, a major construction effort was undertaken at the property to accommodate the expansion of the adjacent WISCO facility. WISCO facilities constructed on the south (upstream) end at Terminal 2 included three shipways and outfitting docks with four attendant craneways along with a portion of a machine shop (that only partially extended onto Terminal 2). Facilities constructed in the central portion of the property consisted of a series of buildings including an angle furnace building, pipe shop, utility building, painting/pickling building and other supporting buildings. The northwest (downstream) portion of the property contained two outfitting docks and a basin that was intended for a dry dock that was never installed. The basin was approximately 120 feet wide and 550 feet long and 50 feet deep. Southwest of the shipways and outfitting docks were a series of buildings used for support utilities, support services, and administrative services.</p>	<p>See drawings and maps at Tab 3.</p> <p>See property transaction records at Tab 5, specifically:</p> <p>Hahn and Associates, Inc. 2005. A Phase I Environmental Site Assessment, Volume I, Approximate 52.03-acre Port of Portland Terminal 2 Property, 3074-3576 NW Front Avenue, Portland, Oregon. Prepared for the Port of Portland. May 31, 2005.</p> <p>See site investigation records at Tab 6, specifically:</p> <p>Port of Portland. 2000. Preliminary Assessment, Port of Portland, Terminal 2, 3556 NW Front Avenue, Portland, Oregon, 97210. August 29, 2000.</p> <p>See other environmental records at Tab 7,</p>

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
	<p>Following the City CPD's acquisition of the property in 1949, the following modifications to the property were made:</p> <p>1951 – Authorized WISCO's removal of "Plastic Paint Shed"</p> <p>1952 – Demolished four framed buildings at "Dock 4" in the northern portion (now central portion) of the property</p> <p>1953 – Acquired the Oceanic Terminal property to provide rail access to the terminal; Berth 3 rehabilitated and new yard lighting installed.</p> <p>1960 – Demolished Angle Furnace Building (now Sulzer Pumps U.S. property)</p> <p>1965/66 – Demolished "old shipyard" area, clearing area by removing all buildings including pipe shop and Substation No. 4</p> <p>1968 – Renovated former WISCO parcel and filled approximately 3 acres of submerged land. CPD modernized the upstream portion of Terminal 2 to create to general cargo berths, Berths 5 and 6 and constructed a wharf with a concrete deck.</p> <p>1969 – Constructed transit shed (now Warehouse 205), along with an attached 3-story Administration Building and tower room</p> <p>1970 – Demolished the Packard Building; constructed dock ramp and mooring facility at Berth 4</p> <p>Since the Port acquired the Terminal 2 property in 1971, the following modifications have occurred:</p> <p>1971 – Constructed Building 3070</p> <p>1971 – Demolished former Zidell Building</p> <p>1980 – Constructed Gearlocker Building</p> <p>1981 – Constructed Warehouse 206</p> <p>1983 – Constructed steam cleaning facility for SSA</p> <p>1985 – Rehabilitation (modernization) of Terminal 2. Oceanic Terminal demolished; created new land area at the terminal through by filling approximately 11.85 acres of submerged land. Replaced outdated slips with two new berths.</p> <p>1987-88 – Constructed Warehouses 203 and 204, Administration Building, and dock structures at Berths 203 and 204</p> <p>1989 – Constructed gearlocker storage building</p> <p>1991 – Added ramps to low-level dock</p> <p>1995 – Added electric shop trailer</p> <p>1996 – Removed top two floors of Administration Building at Warehouse 205</p> <p>1998 – Demolished Buildings 3060 and 3070</p>	<p>specifically:</p> <p>2007-050 U.S. Army Corps of Engineers/Oregon Department of State Lands Joint Permit Application for Maintenance Dredging, Marine Terminal 2, Berths 205 and 206, Lower Willamette River, Portland, Oregon.</p> <p>Letter to Willamette Iron and Steel Company Attention: E.J. Glenn regarding Authority to Dismantle Plastic Paint Shed. September 17, 1951.</p>
<p>I. all maps and drawings of the Property in your possession; and</p>	<p>Maps and drawings identified relevant to the Terminal 2 property are included at Tab 3 and in the records referenced in the next column to the right. In addition, certain reports, letters and memos also contain figures and drawings of the property. These documents are included in Tabs 5 through 8.</p>	<p>See drawings and maps at Tab 3.</p> <p>See property transaction records at Tab 5.</p> <p>See site investigation records at Tab 6.</p>

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
		See other environmental records at Tab 7. See additional references at Tab 8.
m. all aerial photographs of the Property in your possession.	Aerial photographs relevant to the Terminal 2 property are included in Tab 4. In addition, certain reports, letters and memos also contain aerial photos of the property. These documents are included in Tabs 5 through 7.	See aerials photographs at Tab 4. See property transaction records at Tab 5. See site investigation records at Tab 6. See other environmental records at Tab 7.
14. For Properties adjacent to the Willamette River, provide specific information describing the river-ward boundary of private ownership and where state aquatic lands and/or state-management jurisdiction begins. Provide a map that delineates the river-ward boundary of each Property.	The Terminal 2 property boundary is the line of ordinary high water. The property boundary was resolved by the property sale and boundary settlement between the Port and DSL of November 1987. The settlement contains a figure depicting the line of ordinary high water.	See maps and drawings at Tab 3.
15. For each Property, provide all reports, information or data you have related to soil, water (ground and surface), or air quality and geology/hydrogeology at and about each Property. Provide copies of all documents containing such data and information, including both past and current aerial photographs as well as documents containing analysis or interpretation of such data.	See records at Tab 5, Tab 6 and Tab 7.	See property transaction records at Tab 5. See site investigation records at Tab 6. See other environmental records at Tab 7.
16. Identify all past and present solid waste management units or areas where materials are or were in the past managed, treated, or disposed (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) on each Property. For each such unit or area, provide the following information: a. a map showing the unit/area's boundaries and the location of all known units/areas whether currently in operation or not. This map should be drawn to scale, if possible, and clearly indicate the location and size of all past and present units/areas; b. dated aerial photograph of the site showing each unit/area; c. the type of unit/area (e.g., storage area, landfill, waste pile, etc.), and the dimensions of the unit/area; d. the dates that the unit/area was in use; e. the purpose and past usage (e.g., storage, spill containment, etc.); f. the quantity and types of materials (hazardous	No information was identified regarding such units on the Terminal 2 property. Information on DEQ-supervised investigations at the property is included in response to Question 71. Information regarding materials management and storage is provided in response to Questions 11 and 21.	

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
substances and any other chemicals) located in each unit/area and; g. the construction (materials, composition), volume, size, dates of cleaning, and condition of each unit/area.		
17.If the unit/area described above is no longer in use, how was such unit/area closed and what actions were taken to prevent or address potential or actual releases of waste constituents from the unit/area.	Not applicable.	
18.For each Property, provide the following information regarding any current or former sewer or storm sewer lines or combined sanitary/storm sewer lines, drains, ditches, or tributaries discharging into the Willamette River:	Historical sanitary and storm sewer information is contained in the maps and drawings included at Tab 3.	See maps and drawings at Tab 3.
a. the location and nature of each sewer line, drain, ditch, or tributary;	A general description of the stormwater system that is present at the Terminal 2 property is provided in response to Question 13 (i) above.	
b. the date of construction of each sewer line, drain, ditch, or tributary;	Unknown.	
c. whether each sewer line, or drain was ever connected to a main trunk line	The sanitary sewer lines connect to a main trunk line located at NW Front Avenue. See Figure 3 of the Revised Stormwater Evaluation Work Plan (ACA, 2007).	See site investigation records at Tab 6, specifically: Ash Creek Associates, Inc./NewFields. 2007. Revised Stormwater Evaluation Work Plan. December 2007.
d. whether each sewer line, drain, ditch, or tributary drained any hazardous substance, waste, material or other process residue to the Willamette River; and	No documented evidence was identified.	
e. any documentation regarding but not limited to the following on any and all outfalls to the Willamette River which are located within the boundaries of the Property(ies). Your response should include, but not be limited to:	See response in sub-bullets (i) through (ii) below.	
i. the areas serviced by the outfalls; and	Basin A. Basin A is comprised of approximately 17.4 acres and drains to Outfall A, which discharges into the Fireboat Cove located north of the property. Basin A includes the administration building, a large parking lot, the security station, Warehouse 203, and the dock office. Basin B. Basin B is comprised of approximately 33 acres and drains to Outfall B, which subsequently discharges to the Willamette River at the approximate location of the Basin A/Basin B divide. Basin B includes Warehouses 204, 205 and 206, the guard house, the electric shop, the Gearlocker Building, the Gearlocker Maintenance Building, and modular trailers for office and storage uses. See Figure 3 of the Revised Storm Water Evaluation Work Plan (Ash Creek, 2007) for the current location of	See site investigation records at Tab 6, specifically: Ash Creek Associates, Inc./NewFields. 2007. Revised Stormwater Evaluation Work Plan. December 2007.

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
	outfalls at the Terminal 2 property.	
ii. the type of outfall (i.e., storm water or single facility operational).	All of the outfalls that serve the Terminal 2 property are dedicated to stormwater.	
<p>19. Provide copies of any stormwater or property drainage studies, including data from sampling, conducted at these Properties on stormwater, sheet flow, or surface water runoff. Also provide copies of any Stormwater Pollution Prevention or Maintenance Plans or Spill Plans developed for different operations during the Respondent's operation of each Property.</p>	<p>Stormwater at the Terminal 2 property is managed under the Port's Municipal Separate Storm Sewer System (MS4) Discharge Permit No. 101314, the Port's NPDES 1200-Z General Industrial Storm Water Permit, and SSA's NPDES 1200-Z General Industrial Storm Water Permit.</p> <p>See site investigation records at Tab 6 for stormwater or property drainage studies, including data from the Port's 1200-Z Annual Reports.</p> <p>Under DEQ's Source Control program, the Port is currently completing a Storm Water Evaluation to confirm storm water from the Terminal 2 property is not a current source to the Willamette River. The evaluation includes sample collection from four representative storm events and analysis for TPH-Dx, phthalates, PCB Aroclors, and PAHs. During March 2008, samples from three of the four storm events were collected and analyzed. The fourth and final storm event is planned for Fall 2008. Analytical results from the three sampling events indicate low to trace concentrations of some PAHs and bis (2-ethylhexyl) phthalate. Under its permits, the Port regularly maintains and cleans catch basins and drain inlets annually. This maintenance was last performed at the property in November 2007. Currently a storm line and catch basin cleanout is planned for 2008.</p> <p>See Tab 7 for Stormwater Pollution Prevention or Maintenance Plans or Spill Plans for both the Port and tenants of the property.</p>	<p>See site investigation records at Tab 6, specifically:</p> <p>Ash Creek Associates, Inc./NewFields. 2007. Revised Stormwater Evaluation Work Plan. December 2007.</p> <p>See other environmental records at Tab 7, specifically:</p> <p>Stormwater Sampling Analytical Results for Terminal 2 for Spring 2008, Winter 2008, Spring 2007, and Fall 2007 Sampling Events.</p> <p>Stormwater Sampling Analytical Results for Terminal 2 for Fall 2006, Spring 2006, and Fall 2005 Sampling Events.</p> <p>2008 T2 1200-Z Annual Reports</p> <p>T2 1200-Z 2005-06 Annual Report Amendment</p> <p>T2 1200-Z 2005-06 Annual Report</p> <p>T2 1200-Z 2006-07 Annual Report</p> <p>T2 1200-Z 2006-07 Annual Report-Sample Results-1</p> <p>Port of Portland. 2005. Terminal 2 Stormwater Pollution Control Plan. September 19, 2005.</p> <p>Port of Portland. 2006. Terminal 2 Stormwater Pollution Control Plan. December 26, 2006.</p> <p>Port of Portland. 2007. Terminal 2 Stormwater Pollution Control Plan. November 20, 2007.</p>

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
		<p>GE Safety & SPCC Plan for Port PCB Removal</p> <p>Memo to Tom Peterson, Kathy Jensen and Bruce Newgard, Port of Portland regarding Recommended Welding Procedures, T2 Transformer Project. March 22, 1989.</p> <p>Letter to Dennis Jurries, Oregon Department of Environmental Quality regarding Annual Stormwater Monitoring Data Submittal. July 30, 2003.</p> <p>Letter to Sharon Stalsberg, Port of Portland-SSA Marine regarding Lab Analysis Results. April 4, 2006.</p> <p>Letter to Lorali Sinnen, Port of Portland, regarding Stormwater Analysis. August 6, 2007.</p>
Section 4.0 - Respondent's Operational Activities		
<p>20. Describe the nature of your operations or business activities at each Property. If the operation or business activity changed over time, please identify each separate operation or activity, the dates when each operation or activity was started and if applicable, ceased.</p>	<p>The Port is the current land owner of the Terminal 2 property and has owned the property since January 1, 1971. Since that time, the Port has acted as the property manager for the tenants and users that lease and use the warehouses, yard space and berths at the property.</p> <p>In 1985, SSA operated the Terminal under a management agreement with the Port, taking over all terminal management; the Port continued to maintain the cranes. In 2005, SSA terminated its management agreement with the Port and entered into a lease agreement for reduced space and operations at the Terminal. The Port leases or licenses other portions of the property for a variety of temporary and other uses. Today, as the owner, the Port performs activities for tenants, which include maintaining in good working order limited interior systems (plumbing and sprinklers), exterior structural components (windows, siding, roofs) and general maintenance of pavement and rail leads. The Port also has general maintenance responsibility for the craneways and berths (e.g. piling replacement).</p> <p>From 1971 to 1974, the Port's activities at Terminal 2 also included limited receipt and delivery (loading and unloading) from rail and trucks, and for a period of time between 1975 and 1981, the Port used part of Terminal 2 for moorage of the Dredge Oregon and the Steamer Portland.</p> <p>See also the response to Questions 4 and 5 above.</p>	<p>See property transaction records at Tab 5, specifically:</p> <p>Hahn and Associates, Inc. 2005. A Phase I Environmental Site Assessment, Volume I, Approximate 52.03-acre Port of Portland Terminal 2 Property, 3074-3576 NW Front Avenue, Portland, Oregon. Prepared for the Port of Portland. May 31, 2005.</p> <p>See site investigation records at Tab 6, specifically:</p> <p>Port of Portland. 2000. Preliminary Assessment, Port of Portland, Terminal 2, 3556 NW Front Avenue, Portland, Oregon, 97210. August 29, 2000.</p>

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
<p>21. At each Property, did you ever use, purchase, generate, store, treat, dispose, or otherwise handle any waste, or material? If the answer to the preceding question is anything but an unqualified "no," identify:</p> <ol style="list-style-type: none"> in general terms, the nature and quantity of the waste or material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled; the chemical composition, characteristics, physical state (e.g., solid, liquid) of each waste or material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled; how each such waste or material was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you; and the quantity of each such waste or material used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you. 	<p>Material handling and disposal at the Terminal 2 property are described further in response to Questions 26, 39, 40, 64 and 71. Contractors associated with those occurrences are identified in Question 6 (b) above.</p>	
<p>22. Describe all activities at each Property that was conducted over, on, or adjacent to, the Willamette River. Include in your description whether the activity involved hazardous substances, waste, or materials and whether any such hazardous substances, waste, or materials were discharged, spilled, disposed of, dropped, or otherwise came to be located in the Willamette River.</p>	<p>When the City CPD owned the Terminal 2 property, over-water activities included cargo handling and storage, and administrative offices. In addition, WISCO leased discrete berth areas from the City CPD for ancillary operations associated with its adjacent shipyard.</p> <p>Since the Port's acquisition of the Terminal 2 property in 1971, various stevedoring companies operated marine cargo facilities at the Terminal. The stevedoring companies also conducted landside operations (rail and truck transfer) beginning in at least 1974. From 1985-2005, SSA had exclusive management and control of the landside and marine cargo operations. The Port has had general maintenance responsibility for the berths (e.g. maintenance dredging, piling replacement). Generally, the Port's over-water activities adjacent to the property have included temporary moorage of the Dredge Oregon and the Steamer Portland from 1971 to 1985. See also response to Questions 4 (c), 5 and 20 above.</p> <p>Activities by stevedoring companies and other entities at the berths include general berthing and wharfing and related activities (loading and unloading products across docks). Products that passed through Terminal 2 have included lumber, agricultural and manufactured wood products, automobiles, break bulk lumber, plywood pulp and bulk paper products, steel rail, and bulk products (e.g., urea). Activities by stevedoring companies and associated vessels that called on Terminal 2 from 1971 to the present are governed by the Port's published tariff, approved by the Federal Maritime Commission.</p> <p>Available information from regulatory agencies and Port records were reviewed for information on spills and releases. Based upon available records for the post-1970 period, over-water spills and spills to the river have been identified as follows:</p> <ul style="list-style-type: none"> 6/17/1978 – Oil and bilge water released when the Dredge Oregon sank while moored at Berth 201. Western Environmental Services (a division of Willamette-Western) and Fred Devine Diving and Salvage contained the release with booms, sorbet material and skimmers. Approximately 3,862 gallons 	<p>See agreements and contracts at Tab 1.</p> <p>See property transaction records at Tab 5, specifically:</p> <p>Hart Crowser. 1991. Environmental Assessment Report, Marine Terminal 2, Portland, Oregon. Prepared for the Port of Portland. August 7, 1991.</p> <p>URS Corporation. 2001. Final Report, Phase I Environmental Site Assessment, Terminal 2 - Port of Portland, Portland, Oregon. Prepared for Stevedoring Services of America. January 2001.</p> <p>Hahn and Associates, Inc. 2005. A Phase I Environmental Site Assessment, Volume I, Approximate 52.03-acre Port of Portland Terminal 2 Property, 3074-3576 NW Front Avenue, Portland, Oregon. Prepared for the Port of Portland. May 31, 2005.</p> <p>See site investigation records at Tab 6, specifically:</p> <p>Port of Portland. 2000. Preliminary Assessment,</p>

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
	<p>of oil was recovered.</p> <ul style="list-style-type: none"> • 5/24/1989 – A spill occurred when three barrels of sulfuric acid fell from the vessel “Dimosta” onto the dock near the bullrail and ruptured spilling a small amount of liquid. The liquid was diluted and partially washed away with rainwater into river. The spill was estimated at 165 liters. • 10/14/1991 – Approximately 25 to 30 gallons of diesel was released from the vessel “Sea Venture” at Berth 203 and caused a sheen on the river. Crowley contacted the Coast Guard and Riedel International was called, the area was boomed off, and absorbents were used to control the spill. Approximately 90 percent of the spill was cleaned up within an hour of its release. • 6/28/1992 – Approximately one barrel of oil was released from the vessel “Golden Alpha” at Berth 206. The spill caused a sheen on the river that extended about 200 feet around the ships stern. • 7/7/1992 – Approximately 50 liters of used oil was released from the vessel “Belforest” into the river at Berth 206. • 12/8/1992 – On 12/5/1992, a piece of SSA equipment was found to be leaking hydraulic fluid. Despite application of sorbent material by SSA, hydraulic fluid was discharged to the storm water system and subsequently released to the Willamette River in the vicinity of Berth 204 where it created a sheen to be several hundred square feet in size. • 1/15/1995 – Approximately 5 to 6 gallons of paint was released into the Willamette River during loading of a vessel (either from cargo or ship stores). Storm conditions in the area caused the paint to spread over a 200-ft area. • 2/5/1996 - Approximately 1 gallon of motor oil was released to the dock on the northern portion of the property, due to a damaged barge lift operated by one of SSA’s customers. Due to rain, the sheen expanded to a larger area and discharged to the Willamette River through the storm water conveyance system. Absorbent booms were placed around the catch basins once the spill was identified and the release was reported to the Coast Guard. Absorbent booms were also placed in the river in the vicinity of the storm water outfalls to prevent the remainder of the material from dispersing. The oil was subsequently cleaned up from the dock and properly disposed of off-site. • 10/17/1997 – An employee exited an SSA truck while the engine was still running and the vehicle rolled over the bullrail at Berth 206 and sank in the Willamette River. No sheen or debris in the river was observed. The vehicle was pulled from the river approximately two hours after it sank. • 10/9/1998 – Approximately two gallons of hydraulic oil from the vessel “Pacific King” was released and an estimated one gallon reached the river. • 1/16/1999 – Prior to departing Berth 206, the fuel/oil was discharged from the stern of the vessel “Micronesian Nations”. The diameter of the spill was approximately 150 ft. by 200 ft. under the dock. The Coast Guard was notified. No additional information was available. • 10/25/2000 – Small lube oil/diesel spill from unknown source impacted the river. • 10/26/2000 – A spill was reported from two different sources, including diesel that had been tracked around the property from a leaking vehicle and motor oil near a storm drain (source unknown). SSA put pads and booms around the storm drains, but a sheen was present on the river at Berth 203. Foss Environmental was contacted for cleanup and the incident was reported to the National Response Center and the Oregon Emergency Response System. • 8/20/2004 – A personal watercraft struck piling #221 at Berth 204 and sank. Gasoline was noted leaking from the sunken boat. Fred Devine Diving and Salvage was contacted to recover the vessel. 	<p>Port of Portland, Terminal 2, 3556 NW Front Avenue, Portland, Oregon, 97210. August 29, 2000.</p> <p>Ash Creek Associates, Inc./NewFields. 2007. Revised Stormwater Evaluation Work Plan. December 2007.</p> <p>See other environmental records at Tab 7, specifically:</p> <p>E-mail to Dan Hancock, Russ Korvola, and Padraic Quinn, Port of Portland, Subject: T-2 Oil Slick. October 31, 1994.</p> <p>E-mail to Kathi Futornick, Russ Korvola, Mike Dowsett, Fletcher Hunt, Jr., Padraic Quinn, and Suzanne Barthelmess, Port of Portland, Subject: Weekend Spills. January 17, 1995</p> <p>Environmental Incident Report Form regarding T2 Diesel Spill. October 14, 199110-14-91.</p> <p>E-mail to Kristi Maitland, Port of Portland, regarding Sheen Reported in Fireboat Slip Adjacent to T2. January 6, 2005.</p> <p>Environmental Incident Report regarding T2 Berth 203 Diesel Spill. October 14, 1991.</p> <p>Environmental Incident Report Form regarding T2 Berth 206 Oil Slick. July 7, 1992.</p> <p>Environmental Incident Report Form regarding T2 Oil Slick. October 30, 1994.</p> <p>Letter Report to Russ Korvola, Port of Portland regarding Response to Oil Spill on Willamette River, Marine Terminal 2, Port of Portland, Portland, Oregon. December 9, 1992.</p> <p>Letter Report to Dave Neset, Port of Portland regarding Dredge Oregon - Fuel Oil Report.</p>

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
	<p>These environmental conditions in-water near Terminal 2 were also observed:</p> <ul style="list-style-type: none"> • 11/04/1981 – Oil was observed on the water underneath Berths 201 to 203. The Coast Guard was notified and they indicated it was a sheen of diesel originating from “down river”. • 5/16/1983 – An oil and red paint mixture was observed traversing the length of Berth 205. The oil/paint slick was approximately 1,800 feet long and 10 to 12 feet wide. Although the source could not be determined, it appeared to be originating from upstream and extended a short distance beyond the WISCO fence. • 4/14/1985 – A 100 ft. by 300 ft. sheen was observed traversing the lengths of Berths 205 and 206. The Coast Guard determined the source to be soot from the vessel “Allunga” which was berthed at the WISCO facility for overhaul work. • 7/19/1989 – A light sheen was observed on the river in the vicinity of Berth 206. • 7/10/1989 – A sheen was observed in the water off of Berths 203 and 204 and appeared to be originating from Western Transportation upstream. • 12/20/1993 – A thick foamy substance was observed in the water in the vicinity of Berth 206. The source was determined to be a substance originating from the “Overseas Boston”, which was berthed at the Sulzer-Bingham facility. • 10/30/1994 – An oil slick was identified off Terminal 2 in the vicinity of Berth 206. The Coast Guard was contacted and they indicated that the slick was residual oil from a Union Pacific Railroad spill that occurred the previous week. The Coast Guard decided the sheen would break up and did not require clean-up. • January 5 through 6, 2005 – A sheen was observed in the City of Portland’s Fireboat Cove adjacent to Terminal 2 during dredging activities associated with a utility locate. Port staff videotaped sediments being sucked up, sprayed into the air and being deposited back into the slip. 	<p>September 7, 1978.</p> <p>Marine Security Report of Damage regarding Terminal 2 Forklift No. 27753 Hydraulic Leak. June 17, 1993.</p> <p>Marine Security Special Report regarding Film Observed at Terminal 2. July 19, 1989.</p> <p>Marine Security Special Report regarding Water Pollution at Terminal 2. July 10, 1989.</p> <p>Marine Security Special Report regarding Foamy Thick Substance in Water at Terminal 2. December 20, 1993.</p> <p>Marine Security Special Report regarding Leak from Hyster No. 80760 at Terminal 2. June 21, 1992.</p> <p>Marine Security Special Report regarding Oil Spill from Vessel Golden Alpha. June 28, 1992.</p> <p>Memo to File. Subject: Environmental Incident Report for Oil Sheen at Terminal 2. October 31, 1994.</p> <p>Memo to G.B. Southworth, Port of Portland, Subject: Oil Spill at T-2. 11-04-81.</p> <p>Memo to G.B. Southworth, Port of Portland regarding River Pollution, Area of T-2, B-205. May 16, 1983.</p> <p>Memo to G.B. Southworth, Port of Portland regarding Slick at B-205/206. April 14, 1985.</p> <p>Memo to File regarding Sulfuric Acid Spill at T-2. May 24, 1989.</p> <p>Incident Report, Terminal 2. October 17, 1997.</p> <p>Environmental Incident Report, Terminal 2.</p>

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
		<p>January 16, 1999.</p> <p>Marine Terminals Incident Report 04-2-0140. August 20, 2004.</p>
<p>23. For each Property at which there was or is a mooring facility, dock, wharf or any over-water structure, provide a summary of over-water activities conducted at the structure, including but not limited to, any material loading and unloading operations associated with vessels, materials handling and storage practices, ship berthing and anchoring, ship fueling, and ship building, retrofitting, maintenance, and repair.</p>	<p>Over-water structures at the Terminal 2 property have generally been used for the loading and unloading of break-bulk materials and containers, with some instances of bulk materials from vessels that call on the marine terminal. Break-bulk materials have included steel, lumber, logs and lesser quantities of bulk materials, including grain and bulk minerals (bauxite and magnesium) and fertilizers (urea). The loading and unloading of vessels is governed by the Port's regulatory tariff, as amended from time to time.</p> <p>As discussed in response to Question 11, the Terminal 2 property was part of the WISCO shipyard from 1941 to 1949. During WISCO operations, over-water activities included the outfitting, conversion and repair of ships. Over-water activities associated with the historical sawmill and shipyard operations were performed in areas that were subsequently filled to create the current property. Thus, none of these operations were conducted in areas that are currently within the Willamette River. Activities performed during Oceanic Terminal operations included the loading and unloading of agricultural and manufactured wood products. Many of these areas have also since been filled.</p> <p>Over-water activities conducted at the Terminal 2 property by the Port include general maintenance responsibility for the berths (e.g. maintenance dredging and piling replacement) and the moorage of the Dredge Oregon and the Steamer Portland from 1975 to 1981.</p> <p>See also the response to Questions 11 and 22 above.</p>	<p>See other environmental records at Tab 7, specifically:</p> <p>Department of the Army Permit No. 200500426 and Notice of Authorization for Fender Pile Maintenance at Terminal 2.</p> <p>See tariffs and spills and releases information in Tab 7 of the Port's 104(e) response to Terminal 1 North, submitted to EPA and dated July 16, 2008.</p>
<p>24. Describe all activities conducted on leased aquatic lands at each Property. Include in your description whether the activity involved hazardous substances, waste, or materials and whether any such hazardous substances, waste, or materials were discharged, spilled, disposed of, dropped, or otherwise came to be located on such leased aquatic lands.</p>	<p>Not applicable.</p>	
<p>25. Please describe the years of use, purpose, quantity, and duration of any application of pesticides or herbicides on each Property during the period of investigation (1937 to the present). Provide the brand name of all pesticides or herbicides used.</p>	<p>Based on a review of health and safety records, it appears SSA or SSA's contractor used methyl bromide at the SSA leasehold in 1997 to fumigate containers. In addition, when Italia/d'Amico was calling on Terminal 2 during SSA's management (circa 2000), there was a concern with Mediterranean snails (an invasive species) on certain vessels and fumigation was required before the containers could be released. The fumigation was reportedly sporadic and only involved a few containers per year.</p> <p>No additional information regarding the application of pesticides or herbicides at Terminal 2 was identified in available records.</p>	<p>See health and safety records at Tab 8.</p>

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
<p>26. Describe how wastes transported off the Property for disposal are and ever were handled, stored, and/or treated prior to transport to the disposal facility.</p>	<p>Based on available records, wastes transported from the property during the Port's ownership (1971 to present) are handled prior to transport as follows:</p> <ul style="list-style-type: none"> • Non-hazardous solid waste is collected in several large receptacles throughout the property. The containers are maintained by Waste Management, Inc. and are emptied periodically or as needed. • Non-hazardous waste generated by specific projects are contracted for disposal as a component of the project and are generally not stored on site for long periods of time. • Hazardous waste – based on a Notification of Hazardous Waste Activity in January 1988, it appears the Port generated an ignitable waste. No additional information was available. See also response to Question 53. 	<p>See property transaction records at Tab 5, specifically:</p> <p>URS Corporation. 2001. Final Report, Phase I Environmental Site Assessment, Terminal 2 - Port of Portland, Portland, Oregon. Prepared for Stevedoring Services of America. January 2001.</p> <p>See site investigation records at Tab 6, specifically:</p> <p>Port of Portland. 2000. Preliminary Assessment, Port of Portland, Terminal 2, 3556 NW Front Avenue, Portland, Oregon, 97210. August 29, 2000.</p> <p>Port of Portland. 2000. Terminal 2, Preliminary Assessment Appendix I.</p> <p>See other environmental records at Tab 7.</p>
<p>27. Has Respondent ever arranged for disposal or treatment or arranged for transportation for disposal or treatment of materials to any Property (including the Willamette River) within the Investigation Area? If so, please identify every Property that Respondent's materials were disposed or treated at in the Investigation Area. In addition, identify:</p> <ol style="list-style-type: none"> a. the persons with whom the Respondent made such arrangements; b. every date on which Respondent made such arrangements; c. the nature, including the chemical content, characteristics, physical state (e.g., solid, liquid) and quantity (volume and weight) of all materials involved in each such arrangement; d. in general terms, the nature and quantity of the non-hazardous materials involved in each such arrangement; e. in general terms, the nature and quantity of any hazardous materials involved in each such arrangement; f. the owner of the materials involved in each such arrangement, if not Respondent; 	<p>The Port has not located any information indicating that it arranged for disposal or treatment of materials at the Terminal 2 property.</p>	

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
g. all tests, analyses, analytical results or manifests concerning each hazardous material involved in such transactions; h. the address(es) for each Property, precise locations at which each material involved in such transactions actually was disposed or treated; i. the owner or operator of each facility at which hazardous or non-hazardous materials were arranged to be disposed at within the Investigation Area; j. who selected the location to which the materials were to be disposed or treated; k. who selected the Property as the location at which hazardous materials were to be disposed or treated; and l. any records of such arrangement and each shipment.		
28. Describe the plants and other buildings or structures where Respondent carried out its operations at each Property within the Investigation Area (excluding locations where ONLY clerical/office work was performed).	See response to Question 13 (d) above.	
29. Provide a schematic diagram or flow chart that fully describes and/or illustrates the Respondent's operations on each Property.	Not applicable. The Port did not conduct any activities at the Terminal 2 property that could be or were depicted in a schematic diagram.	
30. Provide a brief description of the nature of Respondent's operations at each location on each Property including: a. the date such operations commenced and concluded; and b. the types of work performed at each location, including but not limited to the industrial, chemical, or institutional processes undertaken at each location.	<p>The Port is the current owner of the Terminal 2 property. The Port acquired certain property and improvements within what is the Terminal 2 property from the City of Portland Commission of Public Docks (City CPD) effective January 1, 1971.</p> <p>As the owner, the Port engages in property management and maintenance at the Terminal 2 property. The Port also has maintenance responsibilities for the craneways and berths. From 1971 to 1974, the Port's activities at Terminal 2 also included limited receipt and delivery (loading and unloading) from rail and trucks, and for a period of time between 1975 and 1981, the Port used part of Terminal 2 for moorage of the Dredge Oregon and the Steamer Portland.</p> <p>Since its acquisition, the Port has entered into leases and other agreements for use of the Terminal 2 property by entities who are responsible for operations at their lease or use areas. The Port currently holds leases or other agreements for use of the Terminal 2 property with the following tenants:</p> <ul style="list-style-type: none"> • Alexander Gow, Inc. • International Raw Materials Ltd. • National Cargo Bureau • Pacific Maritime Association • APL Logistics Americas, Ltd. 	<p>See property transaction records at Tab 5, specifically:</p> <p>Hahn and Associates, Inc. 2005. A Phase I Environmental Site Assessment, Volume I, Approximate 52.03-acre Port of Portland Terminal 2 Property, 3074-3576 NW Front Avenue, Portland, Oregon. Prepared for the Port of Portland. May 31, 2005.</p> <p>See site investigation records at Tab 6, specifically:</p> <p>Port of Portland. 2000. Preliminary Assessment, Port of Portland, Terminal 2, 3556 NW Front Avenue, Portland, Oregon, 97210. August 29, 2000.</p>

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
	<ul style="list-style-type: none"> Regional Maritime Security Coalition Stevedoring Services of America, Inc. U.S. Army Corp of Engineers <p>Specific information on current and historical tenants and their respective operations is discussed in response to Question 11.</p>	
31. If the nature or size of Respondent's operations changed over time, describe those changes and the dates they occurred.	See response to Questions 4 and 30.	
32. List the types of raw materials used in Respondent's operations, the products manufactured, recycled, recovered, treated, or otherwise processed in these operations.	Not applicable.	
33. Provide copies of Material Safety Data Sheets (MSDS) for materials used in the Respondent's operations.	Available MSDS identified for products or materials at the Terminal 2 property are included in Tab 7.	See other environmental records at Tab 7.
34. Describe the cleaning and maintenance of the equipment and machinery involved in these operations, including but not limited to: a. the types of materials used to clean/maintain this equipment/machinery; b. the monthly or annual quantity of each such material used. c. the types of materials spilled in Respondent's operations; d. the materials used to clean up those spills; e. the methods used to clean up those spills; and f. where the materials used to clean up those spills were disposed of.	<p>SSA managed Terminal 2 from 1985 to 2005 and had responsibility for all terminal equipment and machinery (except for the cranes) during that time. No information is available regarding SSA's cleaning and maintenance activities during that time.</p> <p>The following information was identified regarding the Port's maintenance and cleaning of the cranes and related equipment:</p> <ul style="list-style-type: none"> During the replacement of transformers in Crane 2372, welding was performed prior to the installation of the new transformers. Welding was conducted by the Port and followed procedures outlined in the Welding Procedures Memo dated March 22, 1989. The procedures outlined proper decontamination of equipment, adequate ventilation and appropriate Personal Protective Equipment (PPE). According to letters sent in 1989, the Port contracted Ken Schultz Industrial & Commercial Painting and Sandblasting to conduct maintenance painting on Cranes 2371 and 2372. The cranes were encased and the ground surface around the cranes was covered to prevent any spills or contaminants from entering the Willamette River. 	<p>See other environmental records at Tab 7, specifically:</p> <p>Letter to Port of Portland Attention: Kathy Jensen regarding Terminal 2, Project 20532/Cranes 2371 and 2372 Maintenance Painting. May 25, 1989.</p> <p>Letter to Port of Portland Attention: Kathy Jensen regarding Terminal 2 - Cranes 2371 and 2372 Maintenance Painting, Project #20532, Subject: Sec. 01.300/300.03 - Drapes and Screens - Submittal Data. May 17, 1989.</p> <p>Memo to Tom Peterson, Kathy Jensen and Bruce Newgard, Port of Portland regarding Recommended Welding Procedures, T2 Transformer Project. March 22, 1989.</p>
35. Describe the methods used to clean up spills of liquid or solid materials during Respondent's operation.	The Port has implemented numerous Best Management Practices (BMPs) at Terminal 2 as part of its tenant and licensee contracts, Environmental Management System Program, and continual improvement policy. The Port maintains a Stormwater Pollution Prevention Plan as required by the Port's NPDES General Permit 1200-Z for the Terminal 2 property. Under this plan, the Port provides guidance to employees and property leaseholds on	<p>See site investigation records at Tab 6, specifically:</p> <p>Ash Creek Associates, Inc./NewFields. 2007.</p>

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
	<p>the practice of spill prevention and response.</p> <p>The following is a summary of the spill prevention and response practices:</p> <p>Spill kits are located throughout Terminal 2 in areas which are visible from a distance and easily accessible during an incident. Spill kits contain absorbent pads, booms, sorbent material, drain covers, and personal protective equipment (gloves and goggles). Visible signs are placed above each kit for easy identification. Emergency contact procedures are posted next to each spill kit.</p> <p>Marine Environmental and/or Marine Facilities Maintenance staff conducts monthly spill prevention inspections of storage areas, and equipment to reduce the likelihood of spills and to help ensure that identified spills are cleaned immediately. Inspection forms are kept on file in the Marine Terminal 6 Administration Office.</p> <p>The stevedoring contractors hired to conduct cargo unloading and transfer (by vessel on berth) are required to have a spill response plan and response materials necessary to address potential spills that could occur during their operations at the terminal. SSA implements BMPs within its leasehold in the form of storm water pollution controls, and the Corps, who has not yet fully occupied its leasehold, is also required to have a spill plan in place in accordance with the lease.</p> <p>See Tab 7 for tenant pollution prevention plans.</p>	<p>Revised Stormwater Evaluation Work Plan. December 2007.</p> <p>See other environmental records at Tab7, specifically:</p> <p>Pollution Control Plan for Sauvie Island Bridge Span Assembly at Terminal 2. January 4, 2007.</p> <p>GE Safety & SPCC Plan for Port PCB Removal</p> <p>Port of Portland. 2005. Terminal 2 Stormwater Pollution Control Plan. September 19, 2005.</p> <p>Port of Portland. 2006. Terminal 2 Stormwater Pollution Control Plan. December 26, 2006.</p> <p>Port of Portland. 2007. Terminal 2 Stormwater Pollution Control Plan. November 20, 2007.</p> <p>SSA. 2002. Storm Water Pollution Control Plan, Stevedoring Services of America, Terminal 2. January 31, 2002.</p>
<p>36. For each type of waste (including by-products) from Respondent's operations, including but not limited to all liquids, sludges, and solids, provide the following information:</p> <ul style="list-style-type: none"> a. its physical state; b. its nature and chemical composition; c. its color; d. its odor. e. the approximate monthly and annual volumes of each type of waste (using such measurements as gallons, cubic yards, pounds, etc.); and f. the dates (beginning & ending) during which each type of waste was produced by Respondent's operations. 	<p>See response to Questions 39 and 40 for information regarding wastes generated related to specific projects.</p>	
<p>37. Provide a schematic diagram that indicates which part of Respondent's operations generated each type of waste, including but not limited to wastes generated by cleaning and maintenance of equipment and machinery and wastes resulting from spills of liquid materials.</p>	<p>Not applicable. The Port did not conduct any activities that could be or were depicted in a schematic diagram.</p>	

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
<p>38. Identify all individuals who currently have and those who have had responsibility for Respondent's environmental matters (e.g. responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes). Also provide each individual's job title, duties, dates performing those duties, supervisors for those duties, current position or the date of the individual's resignation, and the nature of the information possessed by such individuals concerning Respondent's waste management.</p>	<p>The Port is the current owner of the Terminal 2 property. The following current employees have (or have had) responsibility for the Port's environmental matters associated with Terminal 2:</p> <ul style="list-style-type: none"> • David Breen, Environmental Project Manager II • Sebastian Degens – Marine Planning & Development Manager • Jennifer Fonseca-Littrell – Environmental Specialist I • Marla Harrison – Operations Environmental Safety Manager I • Stan Jones, Aviation Environmental Compliance Manager • Nicole LaFranchise, Environmental Project Manager III • Sam Ruda, Director of Marine & Industrial Development • Richard Vincent Environmental Project Manager II <p>Former employees who have had responsibility for the Port's environmental matters associated with Terminal 2 include:</p> <ul style="list-style-type: none"> • John Childs, Environmental Project Manager II (1997-2003) • Katherine Futornick, Corporate Environmental Manager (1994-1999) • Danil Hancock, Waterway Resources Manager (1988-1994) • Russell Korvola, Environmental Services Manager (1988-1995) • Cheryl Koshuta, Chief Environmental Officer (1999-2007) • Kristi Maitland, Environmental Project Manager II (2003-2005) • Roland Montagne, Environmental External Affairs Manager (1986-1999) • Don Pettit, Environmental Project Manager II (2005-2007) • Quentin Pitts, Manager, Project Environmental Resources (1995-1996) and Environmental Project Manager II (2006-2008) • Padraic Quinn, Environmental Project Manager II (1993-2002) • Denise Ragland, Marine Superintendent II (1967-2003) • Jack Sabin, Environmental Planner/Environmental Management Specialist (~1978-1988) • Anne Summers, Environmental Project Manager III (2001-2008) 	
<p>39. For each type of waste describe Respondent's contracts, agreements or other arrangements for its disposal, treatment, or recycling.</p>	<p>Agreement for PCB Material Disposal by General Electric. In its contract with the Port dated August 24, 1989, GE agreed to provide all necessary labor, materials, transportation, equipment, and other means required to complete the removal of certain PCB-containing materials.</p> <p>Service Contract for Disposal by Chemical Waste Management. In its service contract with the Port dated November 9, 1987, Chemical Waste Management, Inc. (CWM) agreed to dispose of waste material generated by the spill cleanup of less than one gallon of PCB-containing oil.</p> <p>Certificate of Recycling and Disposal by Salesco Systems. In the certificate of recycling and disposal dated April 22, 1998, Salesco Systems USA, Inc. certified to the Port that the transport, storage, processing and</p>	<p>See agreements and contracts at Tab 1, specifically:</p> <p>Formal Proposal and Agreement With General Electric for Terminal 2 and Terminal 4 PCB Transformers and Material Disposal. August 24, 1989.</p> <p>Service Contract with Chemical Waste Management. November 9, 1987</p>

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
	<p>disposal methods employed to recycle/incinerate a non-leaking PCB lamp ballast was in accordance with the TSCA, Federal Regulations DOT 49 CFR, OSHA 29 CFR, EPA 40 CFR.</p> <p>Steam-Cleaning Sump Waste Disposal. In its contract with the Port dated August 18, 1992, CWM agreed to transport and dispose of waste material generated from cleanout of the steam-cleaning sump.</p> <p>Unison Substation PCB Transformer Reclassification Notice to Proceed. In a notice to proceed dated October 18, 1989, the Port authorized Unison to reclassify and remove PCB transformers at the Terminal 2 property. Under the referenced contract, Unison agreed to provide 24-hr removal of PCB-contaminated liquid during the reclassification process and legal certification of proper disposal on non-liquid material and incineration of PCB liquids.</p> <p>Crane 2371 Transformer Disposal Notice to Proceed. In a notice to proceed dated June 9, 1988, the Port authorized Riedel Environmental to remove and dispose of a PCB-containing transformer in Crane 2371. Under the referenced contract, Riedel agreed to provide proper disposal and certification that PCB-liquids were incinerated and all non-liquid components disposed.</p>	<p>Letter from Port of Portland to Unison regarding Notice to Proceed, Terminal 2 Substation Transformer Reclassification. October 18, 1989.</p> <p>Letter from Port of Portland to Riedel Environmental regarding Notice to Proceed, Terminal 2 Crane 2371 Transformer Disposal. June 9, 1988.</p> <p>See other environmental records at Tab 7, specifically:</p> <p>Certificate of Recycling and Disposal for T2 Non-Leaking PCB Lamp Ballast. April 22, 1998.</p> <p>Hahn and Associates. 1993. Abandoned Drum Disposal, Marine Terminals 2, 4 and 6, Port of Portland, Portland, Oregon. March 5, 1993.</p>
<p>40. Provide copies of such contracts and other documents reflecting such agreements or arrangements:</p> <ol style="list-style-type: none"> state where Respondent sent each type of its waste for disposal, treatment, or recycling; identify all entities and individuals who picked up waste from Respondent or who otherwise transported the waste away from Respondent's operations (these companies and individuals shall be called "Waste Carriers" for purposes of this Information Request); if Respondent transported any of its wastes away from its operations, please so indicate; for each type of waste specify which Waste Carrier picked it up; indicate the ultimate disposal/recycling/treatment location for each type of waste. provide all documents indicating the ultimate disposal/recycling/treatment location for each type of waste; and state the basis for and provide any documents supporting the answer to the previous question. 	<p><u>PCB-Containing Transformers</u></p> <ol style="list-style-type: none"> Aptus Environmental Services, Inc. in Coffeyville, Kansas; Envirosafe Services in Grandview, Idaho; Chemical Waste Management in Arlington, Oregon; Rollins Environmental Services in Deer Park, Texas; Safety Kleen in Deer Park, Texas; North American Environmental Inc. in Tacoma, Washington; and Environmental Services Company (Ensco) in El Dorado, Arkansas. Aptus Environmental Services, Inc., General Electric, Riedel Environmental Services, Inc., Chem-Security Systems, Unison Private Truck Fleet and Environmental Transportation Service, and Hazmat Environmental Group, Inc. Not to the Port's knowledge. See item (b) above. See item (a) above. See records at Tab 7. See records at Tab 7. <p><u>Recyclable Transformer Shells</u></p> <ol style="list-style-type: none"> Mt. Hood Metals (specific location not known) Riedel Environmental Services, Inc. See item (b) above. See item (a) above. See records at Tab 7. See records at Tab 7. See records at Tab 7. 	<p>See agreements and contracts at Tab 1, specifically:</p> <p>Formal Proposal and Agreement With General Electric for Terminal 2 and Terminal 4 PCB Transformers and Material Disposal. August 24, 1989.</p> <p>Service Contract with Chemical Waste Management. November 9, 1987.</p> <p>See other environmental records at Tab 7, specifically:</p> <p>Certificate of Recycling and Disposal for T2 Non-Leaking PCB Lamp Ballast. April 22, 1998.</p> <p>Hahn and Associates. 1993. Abandoned Drum Disposal, Marine Terminals 2, 4 and 6, Port of Portland, Portland, Oregon. March 5, 1993.</p>

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
	<p><u>Steam Cleaning Sump – Non-Hazardous Waste</u></p> <ul style="list-style-type: none"> a. Western Compliance Services, Inc. in Sherwood, Oregon; and Hillsboro Landfill in Hillsboro, Oregon. b. Spencer Environmental Services, Inc. (SES), Chemical Waste Management, Western Compliance Services, Inc. and Wark Trucking and Excavating Inc. c. See item (b) above. d. See item (a) above. e. See records at Tab 7. f. See records at Tab 7. g. See records at Tab 7. <p><u>Drain Clean-Out – Non-Hazardous Waste</u></p> <ul style="list-style-type: none"> a. Harbor Oil Company (oily liquid) in Portland, Oregon, Hillsboro Landfill in Hillsboro, Oregon; and St. John's Landfill (solids) in Portland, Oregon. b. NWFS, Wark Trucking and Excavating and Chem-Security Systems c. See item (b) above. d. See item (a) above. e. See records at Tab 7. f. See records at Tab 7. g. See records at Tab 7. 	
<p>41. Describe all wastes disposed by Respondent into Respondent's drains including but not limited to:</p> <ul style="list-style-type: none"> a. the nature and chemical composition of each type of waste; b. the dates on which those wastes were disposed; c. the approximate quantity of those wastes disposed by month and year; d. the location to which these wastes drained (e.g. septic system or storage tank at the Property, pre-treatment plant, Publicly Owned Treatment Works (POTW), etc.); and e. whether and what pretreatment was provided. 	<p><u>Steam Cleaning Facility</u></p> <p>The following is a summary of SSA's steam cleaning facility located on the Port's Terminal 2 property: A steam cleaning facility was constructed in 1983 near the Gearlocker Building for SSA's operations for the purpose of cleaning vehicles and equipment. The entire steam cleaning facility is bermed with curbs and there are 4-ft sidewalls attached to the curbing to prevent overspray. The surface area in the facility is sloped and directs surface water to a trench drain which then drains to a sump. The water flows through an oil-water separator in the sump prior to going into the City's sanitary sewer system. The sump is pumped out on an as-needed basis depending on how often the steam cleaning facility is used.</p> <p>The City of Portland issued a permit to the Port in 1983 (Permit #400-2) to allow discharge from the oil-water separator to the sanitary sewer. Under the management agreement, SSA operated the steam cleaning facility and oil water separator, and was responsible to comply with all terms and conditions of the City-Port permit. The permit expired in 1994 and SSA has had responsibility for permitting the steam cleaning facility since that time.</p>	<p>See other environmental records at Tab 7 for permit information.</p>

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
	<p>Other Industrial Discharge to Sanitary The following is a summary of Kinder Morgan's discharge to sanitary: In 2007, the City of Portland issued Kinder Morgan, a tenant of the Terminal 2 property, a project-specific industrial wastewater batch discharge permit (Batch-2007-028). This permit allowed the discharge of 12,000 gallons of wash down water from barite unloading activities into the City's sanitary sewer system.</p> <p>Available Port records regarding the waste stream and permit are provided at Tab 7.</p>	
42. Identify any sewage authority or treatment works to which Respondent's waste was sent.	SSA's and Kinder Morgan's waste went to the City of Portland Publicly Owned Treatment Works (POTW).	
43. Describe all settling tank, septic system, or pretreatment system sludges or other treatment wastes resulting from Respondent's operations.	The steam cleaning facility was operated by SSA. However, the Port performed cleanout of the system on occasion. No other records have been located that identify settling tank, septic system, or pretreatment system sludges or other treatment wastes for any Port activities at the Terminal 2 property.	See other environmental records at Tab 7 for steam cleaning facility cleanout records.
44. If applicable, describe the facilities, processes and methods Respondent or Respondent's contractor used, and activities engaged in, either currently or in the past, related to ship building, retrofitting, maintenance or repair, including, but not limited to, dry-docking operations, tank cleaning, painting and re-powering.	To the Port's knowledge, the Port or Port's contractors have not used the Terminal 2 property for activities related to shipbuilding, ship maintenance or repair.	
45. Describe any hazardous substances, wastes, or materials used or generated by the activities described in response to the previous Question and how these hazardous substances, materials and wastes were released or disposed of.	Not applicable.	
46. Provide copies of any records you have in your possession, custody or control relative to the activities described in response to the previous two Questions.	Not applicable.	
47. Describe any process or activity conducted on a Property identified in response to Question 4 involving the acquisition, manufacture, use, storage, handling, disposal or release or threatened release of polychlorinated biphenyl(s) ("PCB(s)" or PCB(s)-containing materials or liquids.	<p>The following PCB-containing electrical equipment was in use during the Port's ownership:</p> <p>Seven pad-mounted, fluid-filled electrical transformers:</p> <ul style="list-style-type: none"> • Serial #T-38801; KVA 500 in Crane 2371; Askarel 172 gallons; Removed for disposal June 1988 • Serial #G145874; KVA 250 in Crane 2372; #1750 130 gallons; Retrofilled with RTEMP 1980 in April 1989 • Serial #T-3879-1; KVA 500 in Crane 2371; #2750 172 gallons; Removed for disposal June 1988 • Serial #G145873; KVA 500 in Crane 2372; Askarel 133 gallons; Retrofilled with RTEMP 1980 in April 1989 	<p>See property transaction records at Tab 5, specifically:</p> <p>Hahn and Associates, Inc. 2005. A Phase I Environmental Site Assessment, Volume I, Approximate 52.03-acre Port of Portland Terminal 2 Property, 3074-3576 NW Front Avenue, Portland, Oregon. Prepared for the Port of Portland. May 31, 2005.</p>

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
	<ul style="list-style-type: none"> Serial #17688 (Unit #287012); KVA 750 at Berth 205; Unknown 186 gallon; Removed for disposal in March 1990 Serial # 17715 (Unit #287013); KVA 750 in Berth 205; Unknown 186 gallon; Removed for disposal in August 1989 Serial #17689 (Unit #287014); KVA 750 in Berth 205; Unknown 285 gallons; Removed in 1999 <p>By 1991, six out of seven PCB containing transformers at the Terminal 2 property had been removed for disposal consistent with the Port's goal of phasing out and removing PCB-containing equipment from its properties. In 1999, the remaining PCB transformer at Terminal 2 was removed.</p> <p>Available documentation did not indicate any other process or activity by the Port that involved the acquisition, manufacture, use, storage, handling, disposal, release or threatened release of PCBs.</p>	<p>See site investigation records at Tab 6, specifically:</p> <p>Port of Portland. 2000. Preliminary Assessment, Port of Portland, Terminal 2, 3556 NW Front Avenue, Portland, Oregon, 97210. August 29, 2000.</p> <p>Identify See other environmental records at Tab 7, specifically:</p> <p>Annual Document for Disposition of PCB Transformers, Terminal 2. April 4, 1989.</p> <p>Hahn and Associates, Inc. (1987). Terminal 2 PCB Cleanup Report, dated October 19, 1987.</p> <p>Port of Portland PCB Transformer Inventory, Terminal 2, January 1991. January 1991.</p> <p>Port of Portland Terminal 2 PCB Transformers, PCB Inspection Logs. Various dates.</p>
48. For each process or activity identified in response to the previous Question, describe the dates and duration of the activity or process and the quantity and type of PCB(s) or PCB(s) containing materials or liquids.	See response to Question 47 for the quantity of PCB-containing oil in the pad-mounted electrical transformers, and the dates the transformers were removed.	
49. For each process or activity identified in response to the previous two Questions, identify the location of the process or activity on the Property.	See response to Question 47 for the former locations of PCB-containing transformers.	
Section 5.0 – Regulatory Information		
50. Identify all federal, state and local authorities that regulated the owner or operator of each Property and/or that interacted with the owner or operator of each Property. Your response is to address all interactions and in particular all contacts from agencies/departments that dealt with health and safety issues and environmental concerns.	<p>Environmental regulators/authorities include:</p> <ul style="list-style-type: none"> Federal – Army Corps of Engineers; National Marine Fisheries Service (NMFS); EPA; Coast Guard State – Oregon DEQ; Department of State Lands (DSL); Oregon Water Resources Division; Oregon Fish & Wildlife Local – City of Portland Bureau of Environmental Services; City of Portland Fire Bureau, City of Portland Harbormaster <p>Health & Safety regulators/authorities include:</p>	

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
	<ul style="list-style-type: none"> Federal – U.S. Department of Labor, Office of Worker’s Compensation Programs; Coast Guard State – State of Oregon, Department of Consumer and Business Services; State of Oregon Worker’s Compensation Division; Oregon OSHA Local – City of Portland Police Bureau; City of Portland Fire Bureau; Multnomah County Sherriff’s Department <p>Known contacts from these are addressed below in question 51.</p>	
<p>51. Describe all occurrences associated with violations, citations, deficiencies, and/or accidents concerning each Property during the period being investigated related to health and safety issues and/or environmental concerns. Provide copies of all documents associated with each occurrence described.</p>	<p>The following occurrences were identified in available records (post-1971); note that the list is not limited to concerns raised with the Port, and includes concerns raised with Port tenants to the extent the Port had those records available:</p> <ul style="list-style-type: none"> 9/13/1990 – EPA inspection of Terminal 2 and Terminal 6 asserted 13 violations, however, only the following violations were associated with Terminal 2: <ul style="list-style-type: none"> No PCB annual records were identified for the calendar year 1979 through 1986. Two PCB transformers (#17688 and #17689) were not registered with the appropriate fire response agency as required. No record was identified for quarterly inspections having been conducted on two PCB transformers (#17688 and #17689) <p>The Port later located the records of quarterly inspections, and settled the action with EPA through the payment of a reduced penalty; no cleanup at Terminal 2 was necessary.</p> 2/18/2003 – During a stormwater inspection of the Terminal 2 property, the City of Portland reviewed the SSA SWPCP and identified the following additions necessary for compliance with SSA’s 1200-Z permit: <ul style="list-style-type: none"> Additions to site map include: outline of drainage areas for two outfalls; pollution control structures; locations of industrial activities; waste disposal areas; and sample point locations. Addition to site map and/or SWPCP text: outfall locations. <p>The following health and safety concerns were identified in available records (post-1971); note that the list is not limited to concerns raised to the Port, and includes concerns raised to Port tenants to the extent the Port had those records available:</p> <ul style="list-style-type: none"> 8/13/1974 – During an inspection of the Terminal 2 property, the U.S. Coast Guard identified violations of 33 CFR 126.15, such as smoking in unauthorized areas, inadequate fire extinguishers, and inadequate clearance to firefighting equipment.. 8/22/1978 – A longshoreman came in contact with acid residue while handling empty pallet boards at Berth 203. The longshoreman was treated by a physician and released. 4/17/1979 – A person who developed a lung condition filed an occupational disease claim against multiple employers. The Port was dismissed, but the case was settled by Brady-Hamilton Stevedore Company (also known as SSA). 	<p>See property transaction records at Tab 5, specifically:</p> <p>Letter to William Wild, Willamette Iron and Steel regarding Fire Inspection Report. September 11, 1974.</p> <p>Letter to Garry Whyte, Port of Portland, regarding Port Safety Inspection at Terminal 2. August 13, 1974.</p> <p>See other environmental records at Tab 7, specifically:</p> <p>Letter to William Hedgebeth, US Environmental Protection Agency, regarding TSCA Inspection, Terminals 2 and 6, Port of Portland. January 25, 1991.</p> <p>U.S. Environmental Protection Agency Complaint Against the Port of Portland, Docket No. 1091-01-18-2615. March 25, 1991.</p> <p>Letter to Robert Woodell, Port of Portland, regarding Toxic Substances Control Act Inspection of Terminals 2 and 6 and Violations Noted. January 17, 1991.</p> <p>Letter from EPA regarding List of PCB Regulation Violations (40 CFR Part 761). January 17, 1991.</p>

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
	<ul style="list-style-type: none"> 6/28/1982 – OSHA Citation E4787-104-82. During an inspection of the maintenance shop, the DeWalt radial arm saw was not observed without an adjustable stop to prevent the blade from running off the table and its cutting head was not set up properly; the Rockwell table saw did not have a hood guard installed; and the Craftsman drill press did not have a complete guard to prevent contact with the horizontal v-belt drive. Other violations were described in this document without reference to which of the Port facilities was in violation. 8/10/1983 – A longshoreman working at Berth 205 developed a skin rash on his hands after a bag of treated dry bean seed broke open during handling. The beans were reportedly treated with pesticides Captan and Lorsban prior to bagging and shipment. The employee was seen by a physician and released. 4/10/1990 – During an inspection of the Terminal 2 property, the Coast Guard issued a warning to the Port for fire hazard related violations, including not conspicuously marking fire appliance locations. 3/13/1996 – Oregon OSHA notified the Port it had received a complaint alleging a tunnel where electrical and atmospheric hazards exist was reclassified as a non-permit required confined space. The Port responded that the tunnel had adequate ventilation, access hatches, and a full-size door for ingress and egress and did not meet OSHA's definition of a confined space. Oregon OSHA responded that the Port had adequately addressed the complaint. 1/29/1997 – A Port electrician drove through SSA's container yard at Terminal 2 and inhaled methyl bromide gas that was being used by Paramount Pest Control to fumigate containers. The employee was taken to the hospital and released. <p>The following health and safety concern was also identified and may be relevant to Terminal 2 but has yet to be confirmed:</p> <ul style="list-style-type: none"> 9/11/1974 – During a routine fire inspection of the Repair Dock at Willamette Iron and Steel certain hazards and violations of Title 31, Fire Regulations of the Portland Municipal Code (Ordinance #130672) were identified. 	<p>Letter to Sharon Stalsberg, Stevedoring Services of America regarding Annual Facility Stormwater Inspection. March 3, 2003.</p> <p>See additional references at Tab 8, specifically:</p> <p>Employer's First Report of Injury or Occupational Illness. August 22, 1978.</p> <p>OSHA Citation E4787-104-82. June 28, 1982.</p> <p>Letter from OSHA to Port of Portland regarding Potential Safety/Health Hazards at Terminal 2. March 13, 1996.</p>
<p>52. Provide a list of all local, state and federal environmental permits ever issued to the owner or operator on each Property (e.g., RCRA permits, NPDES permits, etc.). Please provide a copy of each federal and state permit, and the applications for each permit, ever issued to the owner or operator on each Property.</p>	<p>The following environmental permits and applications were identified in available records; these permits were issued to the Port or its tenant at the Terminal 2 property:</p> <ul style="list-style-type: none"> City of Portland, Waste Discharge Permit #400-2 (1983-1989) City of Portland, Industrial Wastewater Discharge Permit Application (1989) City of Portland, Industrial Discharge Permit #400-044 (1991) City of Portland, Wastewater Discharge Permit #400-004, (1991-1994) Oregon DEQ, Underground Storage Tank Permit Application (1993) City of Portland, Industrial Wastewater Batch Discharge #Batch-2007-029 (2007) Oregon DEQ, 1200-Z NPDES Stormwater Discharge Permit (2007-2012) Oregon DEQ - NPDES Municipal Separate Storm Sewer System (MS4) Discharge Permit No. 101314 was issued to the Port on September 7, 1995 and renewed on July 27, 2005. An application to renew the permit was submitted in September 2, 2008. 	<p>See permit information included at Tab 7.</p>

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
	<p>The following permits and applications were identified related to the permitted filling of the Terminal 2 property:</p> <ul style="list-style-type: none"> • U.S. Army Corps of Engineers & Oregon Division of State Lands, Joint Application for Permit (1984) • U.S. Army Corps of Engineers & Oregon Division of State Lands, Removal Permit #071-OYA-004229 (1984) • U.S. Army Corps of Engineers, Dredging Permit 071-OYA-2-005487 (1985) • City of Portland, Bureau of Buildings, Soil Special Inspection: Application #3290B, Permit #108115 (1985) • Oregon Division of State Lands, Removal/Fill Permit #4064 (1985-1988) <p>The permits, applications and letters modifying permits and applications summarized above are included in Tab 7.</p> <p>Additional permits and applications for work adjacent to the Terminal 2 property are also included in Tab 7.</p>	
<p>53. Did the owner or operator ever file a Hazardous Waste Activity Notification under the RCRA? If so, provide a copy of such notification.</p>	<p>Records identified indicate that the Port filed a Notification of Hazardous Waste Activity in January 1988. This notification indicated that the Port was the generator under a conditionally exempt status for a non-listed hazardous waste. The material code on the notification indicated the material was ignitable (either a liquid with a flashpoint lower than 140° F, an ignitable compressed gas, or an oxidizer). No additional information was available.</p>	<p>See other environmental records at Tab 7, specifically:</p> <p>Notification of Hazardous Waste Activity. January 11, 1988.</p>
<p>54. Did the owner or operator's facility on each Property ever have "interim status" under the RCRA? If so, and the facility does not currently have interim status; describe the circumstances under which the facility lost interim status.</p>	<p>Not to the Port's knowledge.</p>	
<p>55. Provide all RCRA Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.</p>	<p>The Port was not able to locate a facility-specific RCRA Identification Number relative to the notification described in response to Question 53.</p>	
<p>56. Identify all federal offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed.</p>	<p>In available records, the Port identified the following submittals to EPA:</p> <ul style="list-style-type: none"> • 1988 – Notification of Hazardous Waste Activity for a non-listed hazardous waste • 1991 – Response to TSCA Inspection letter • 1991 – PCB Transformer Quarterly Report Summaries, Marine Terminals 2, 4, and 6 • 1991 – PCB Transformer Quarterly Reports, Marine Terminals 2, 4 and 6 	<p>See other environmental records at Tab 7, specifically:</p> <p>Notification of Hazardous Waste Activity. January 11, 1988.</p> <p>Letter to William Hedgebeth, US Environmental Protection Agency regarding PCB Transformer Quarterly Report Summaries, Marine Terminals</p>

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
		<p>2, 4, and 6, Port of Portland. February 21, 1991.</p> <p>Letter to William Hedgebeth, US Environmental Protection Agency regarding PCB Transformer Quarterly Reports, Marine Terminals 2, 4 and 6, Port of Portland. February 27, 1991.</p> <p>Letter to William Hedgebeth, US Environmental Protection Agency regarding Response to TSCA Inspection Letter, Terminals 2 and 6, Port of Portland. February 1, 1991.</p>
<p>57. Identify all state offices to which Respondent has sent or filed hazardous substance or hazardous waste information. State the years during which such information was sent/filed.</p>	<p>In available records, the Port identified the following submittals to state offices:</p> <ul style="list-style-type: none"> • 1993 – Oregon DEQ: Registration Verification Report • 1995 – Oregon DEQ: Registration Verification Report • 1996 – Oregon DEQ: Registration Verification Report 	<p>See other environmental records at Tab 7, specifically:</p> <p>Letter to Don Bloom, City of Portland Fire Bureau regarding PCB-Transformer Registration. April 30, 1991.</p> <p>Oregon Department of Environmental Quality Registration Verification Report for Terminal 2. January 15, 1993.</p> <p>Oregon Department of Environmental Quality Registration Verification Report for Terminal 2. February 20, 1996.</p> <p>Oregon Department of Environmental Quality Registration Verification Report for Terminal 2. February 28, 1995.</p>
<p>58. List all federal and state environmental laws and regulations under which Respondent has reported federal or state governments, including but not limited to: Toxic Substances Control Act, 15 U.S.C. Sections 2601 et seq., (TSCA); Emergency Planning and Community Right-to-Know Act, 42 U.S.C. Sections 1101 et seq., (EPCRA); and the Clean Water Act (the Water Pollution Prevention and Control Act), 33 U.S.C. Sections 1251 et seq., Oregon Hazardous Substance Remedial Action Law, ORS 465.315, Oregon Water Quality law, ORS Chapter 468(b), Oregon Hazardous Waste and Hazardous Materials law, ORS Chapters 465 and 466, or Oregon Solid Waste law, ORS Chapter 459. Provide copies of each report made, or if only oral</p>	<p>Federal</p> <ul style="list-style-type: none"> • Clean Water Act: §404 permits; NPDES (MS4) and 1200-Z permits administered by Oregon DEQ. • Toxic Substances Control Act (TSCA) <p>State</p> <ul style="list-style-type: none"> • NPDES DEQ Municipal Separate Storm Sewer System (MS4) Discharge Permit No. 101314 and 1200-Z permit • Hazardous Substance Remedial Action Rules, Division 122 (OAR 340-122-010 through 0590) • Oregon Hazardous Waste and Hazardous Materials law, ORS Chapters 465 and 466, or Oregon Solid Waste law, ORS Chapter 459 – Oregon DEQ: Registration Verification Reports (1993, 1995 and 1996) 	<p>See site investigation records at Tab 6.</p> <p>See other environmental records at Tab 7.</p>

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
reporting was required, identify the federal and state offices to which such report was made.		
59. Provide a copy of any registrations, notifications, inspections or reports required by the Toxic Substances Control Act, 15 USC § 2601 et seq., or state law, to be maintained or submitted to any government agency, including fire marshal(s), relating to PCB(s) or PCB(s) containing materials or liquids on any Property identified in response to Question 4.	See records at Tab 7.	<p>See other environmental records at Tab 7, specifically:</p> <p>Annual Documents for Disposition of PCB Transformers, Terminal 2. (~1988, 3/19/1990 and 4/4/1989)</p> <p>Daily Diary for Terminal 2 Crane 2371 PCB Transformer Removal. June 24, 1988</p> <p>Annual Records of PCB Manifests and Certificates of Disposal for Years 1987, 1988, 1989, 1990, and 1991.</p> <p>Quarterly PCB Transformer Inspection Reports, Marine Terminal 2, Equipment No. 287001. (Dated: 02-05-86, 08-01-86, 01-05-87, 03-25-87, 07-17-87, 09-30-87, 01-16-88, 04-04-88 and 07-06-88)</p> <p>Quarterly PCB Transformer Inspection Reports, Marine Terminal 2, Equipment No. 287002. (1986-1988)</p> <p>Quarterly PCB Transformer Inspection Reports, Marine Terminal 2, Equipment No. 287003. (1986-1988)</p> <p>Quarterly PCB Transformer Inspection Reports, Marine Terminal 2, Equipment No. 287004.</p>

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
		<p>(1986-1988)</p> <p>Quarterly PCB Transformer Inspection Reports, Marine Terminal 2, Equipment No. 287012. (1986-1988)</p> <p>Quarterly PCB Transformer Inspection Reports, Marine Terminal 2, Equipment No. 287013. (1986-1988)</p> <p>Quarterly PCB Transformer Inspection Reports, Marine Terminal 2, Equipment No. 287014. (1986-1988)</p> <p>Quarterly PCB Transformer Inspection Report, Marine Terminals, Check List Report for 5/1/1985 and 4/10/1986.</p> <p>Transformer Inspection Report. December 14, 1993.</p> <p>Letter to Don Bloom, City of Portland Fire Bureau regarding PCB-Transformer Registration. (04-30-91)</p>
<p>60. Has Respondent or Respondent's contractors, lessees, tenants, or agents ever contacted, provided notice to, or made a report to the Oregon Department of State Lands ("DSL") or any other state agency concerning an incident, accident, spill, release, or other event involving Respondent's leased state aquatic lands? If so, describe each incident, accident, spill, release, or other event and provide copies of all communications between Respondent or its agents and DSL or the other state agency and all documents that were exchanged between Respondent, its agents and DSL or other state agency.</p>	<p>Not to the Port's knowledge.</p>	
<p>61. Describe all notice or reporting requirements to DSL that you had under an aquatic lands lease or state law or regulation regarding incidents affecting, or activities or operations occurring on leased aquatic lands. Include the nature of the matter required to be reported and the office or official to whom the notice or report went to. Provide copies of all such notices or reports.</p>	<p>Not to the Port's knowledge.</p>	

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
Section 6.0 – Releases and Remediation		
<p>62. Identify all leaks, spills, or releases into the environment of any waste, including petroleum, hazardous substances, pollutants, or contaminants, that have occurred at or from each Property, which includes any aquatic lands owned or leased by Respondent. In addition, identify and provide copies of any document regarding:</p> <ol style="list-style-type: none"> when such releases occurred; how the releases occurred (e.g. when the substances were being delivered by a vendor, transported or transferred (to or from any tanks, drums, barrels, or recovery units). And treated); the amount of each hazardous substances, pollutants, or contaminants so released; where such releases occurred; any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release; any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface), or air testing undertaken; all persons with information relating to these releases; and list all local, state, or federal departments or agencies notified of the release, if applicable; include a description of a sulfuric acid spill in May 1989 recorded by the Oregon State Fire Marshall's Office; and Specifically provide all information you have regarding spills, releases or waste disposal practices of Cargill, Inc. on any of your Properties. 	<p>Over-water spills and releases to the river are addressed in the response to Question 22. That summary includes a summary of the May 1989 sulfuric acid spill identified in bullet (i).</p> <p>During the Port's ownership of the Terminal 2 property (1971 to present), the following leaks, spills or releases were identified:</p> <ul style="list-style-type: none"> 8/28/1987 – While working on the "JA Rainbow", a pump failure occurred on the Loci 2400 at Berth 205. The Loci was moved an approximately 1 to 2 gallons of transmission fluid was released. Absorbent materials were placed to clean up the spill. No drains were affected. 5/25/1990 – A 1 to 4 oz. leak was observed from a transformer stored on a pallet. SSA contacted Chempro to clean up the material. Affected media was reported as pavement; there was no indication the material was released to the environment. 3/22/1991 – A transformer was observed leaking oil near one of its bushings. Absorbent material was placed around the base of the transformer, samples were collected and concentrations of PCBs were below the 10 µg PCBs/100 cm2 cleanup standard established for this type of spill by EPA. 6/21/1992 – The Port's Marine Security observed a leak coming from Hyster # 80760 (a forklift). The leaked material was observed covering an area between Warehouse 204 and gearlocker. Absorbent materials were placed in the area and SSA was notified. 6/17/1993 – While SSA was unloading material from the vessel "Comet", a hydraulic valve broke loose on forklift #27753 causing oil to spill on the dock at Berth 206. Sand was placed on the ground where the leak occurred to absorb material. There was no indication the material reached the river. 2/5/1996 – Unknown volume released from derrick barge. <p>In addition, the Port performed quarterly inspections of transformers to identify leaks early and ensure the transformers were regularly maintained. Although small leaks associated with the equipment were identified during these inspections, there is no available documentation that they resulted in releases into the environment.</p> <p>The Quarterly Inspection Reports are provided at Tab7.</p> <p>See also response to Questions 11, 22 and 63.</p>	<p>See property transaction records at Tab 5, specifically:</p> <p>Hart Crowser. 1991. Environmental Assessment Report, Marine Terminal 2, Portland, Oregon. Prepared for the Port of Portland. August 7, 1991.</p> <p>URS Corporation. 2001. Final Report, Phase I Environmental Site Assessment, Terminal 2 - Port of Portland, Portland, Oregon. Prepared for Stevedoring Services of America. January 2001.</p> <p>Hahn and Associates, Inc. 2005. A Phase I Environmental Site Assessment, Volume I, Approximate 52.03-acre Port of Portland Terminal 2 Property, 3074-3576 NW Front Avenue, Portland, Oregon. Prepared for the Port of Portland. May 31, 2005.</p> <p>See site investigation records at Tab 6, specifically:</p> <p>Port of Portland. 2000. Preliminary Assessment, Port of Portland, Terminal 2, 3556 NW Front Avenue, Portland, Oregon, 97210. August 29, 2000.</p> <p>Ash Creek Associates, Inc./NewFields. 2007. Revised Stormwater Evaluation Work Plan. December 2007.</p> <p>See other environmental records at Tab 7, specifically:</p> <p>Quarterly PCB Transformer Inspection Reports, Marine Terminal 2, Equipment No. 287002, dated 2/2/1986, 4/1/1986, 7/9/1986, and 7/6/1988</p> <p>Quarterly PCB Transformer Inspection Report,</p>

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
		<p>Marine Terminal 2, Equipment No. 287003, dated 9/30/1987.</p> <p>Quarterly PCB Transformer Inspection Reports, Marine Terminal 2, Equipment No. 287004, dated 2/1/1986, 3/25/1986, 7/9/1986, 10/3/1986, 1/5/1987, 7/2/1987, 7/6/1988, 10/13/1988,</p> <p>Quarterly PCB Transformer Inspection Reports, Marine Terminal 2, Equipment No. 287012, dated 2/2/1986, 1/5/1987, 9/30/1987, 7/6/1988, 10/11/1988</p> <p>Quarterly PCB Transformer Inspection Report, Marine Terminal 2, Equipment No. 287013, dated 2/2/1986.</p> <p>Quarterly PCB Transformer Inspection Reports, Marine Terminal 2, Equipment No. 287014, dated 1/5/1986, 9/30/1987, 7/6/1988, 10/11/1988, 9/29/1989, 10/5/1990, 4/9/1991,</p> <p>Quarterly Transformer Inspection Report, Terminal 2. May 1, 1985.</p> <p>Letter to Port of Portland, Attention: Marv Byington, Subject: Cranes 2371 and 2372 PCB Transformers, GE File 783-93-0557. July 10, 1987.</p> <p>Marine Security Report of Damage regarding Terminal 2 Forklift No. 27753 Hydraulic Leak. June 17, 1993.</p> <p>Marine Security Special Report regarding Leak from Hyster No. 80760 at Terminal 2. June 21, 1992.</p> <p>T2 PCB Transformer Spill Cleanup Report. October 20, 1987.</p> <p>Terminal 2 SSA PCB Spill Report. May 25, 1990.</p>

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
		<p>Environmental Services Division Project Summary for T2 PCB Cleanup Crane 2372. July 10, 1987.</p> <p>Letter Report to Russ Korvola, Port of Portland, Subject: Port of Portland Marine Terminal 2 (T-2) Transformer Leak Sample and PCB Analyses. March 25, 1991.</p> <p>Fax to Russ Korvola, Port of Portland regarding T-2 Transformer Leak PCB Wipe Sample Analyses, dated March 25, 1991.</p> <p>Environmental Incident Report, Terminal 2. August 28, 1997.</p>
<p>63. Was there ever a spill, leak, release or discharge of waste, including petroleum, or hazardous substances, pollutant or contaminant into any subsurface disposal system or floor drain inside or under a building on the Property? If the answer to the preceding question is anything but an unqualified "no", identify:</p> <ul style="list-style-type: none"> a. where the disposal system or floor drains were located; b. when the disposal system or floor drains were installed; c. whether the disposal system or floor drains were connected to pipes; d. where such pipes were located and emptied; e. when such pipes were installed; f. how and when such pipes were replaced, or repaired; and g. whether such pipes ever leaked or in any way released such waste or hazardous substances into the environment. 	<p>Not to the Port's knowledge.</p>	
<p>64. Has any contaminated soil ever been excavated or removed from the Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify and provide copies of any documents regarding:</p> <ul style="list-style-type: none"> a. amount of soil excavated; b. location of excavation presented on a map or aerial photograph; c. manner and place of disposal and/or storage of excavated soil; 	<p><u>Building 3060 Excavation</u></p> <ul style="list-style-type: none"> a. 108 tons b. See Figure 1 from "Letter to the Port of Portland regarding Summary of Soil with TPH Excavation and Disposal Activities" dated March 5, 1998. c. On February 23, 1998, the stockpiled soil was disposed of at TPS Technologies, a permitted thermal treatment facility in Portland, Oregon. d. February 6, 1998 e. Unknown f. During the demolition of Building 3060, it was determined that a sub-grade boiler room had supplied 	<p>See site investigation records at Tab 6, specifically:</p> <p>Port of Portland. 2000. Preliminary Assessment, Port of Portland, Terminal 2, 3556 NW Front Avenue, Portland, Oregon, 97210. August 29, 2000.</p> <p>Letter to Pad Quinn regarding Summary of Soil</p>

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
<p>d. dates of soil excavation; e. identity of persons who excavated or removed the soil, if other than a contractor for Respondent; f. reason for soil excavation; g. whether the excavation or removed soil contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the soil contained, and why the soil contained such constituents; h. all analyses or tests and results of analyses of the soil that was removed from the Property; i. all analyses or tests and results of analyses of the excavated area after the soil was removed from the Property; and j. all persons, including contractors, with information about (a) through (i) of this request.</p>	<p>heat to the building in the past and that underground piping associated with a former heating oil tank was located below the building. Demolition of this below ground area and subsequent soil sampling revealed impacts to the soil from the former heating oil system.</p> <p>g. Diesel and heavy-oil range hydrocarbons were identified in samples collected. h. NWTPH-Dx Method, VOCs by EPA Method 8260, leachable metals by EPA 1311/6000/7000 Series Methods, and PCBS and pesticides by EPA Method 8081 i. PAHs by EPA Method 8270-SIM and for BTEX by EPA Method 8020. j. Port of Portland, Hart Crowser</p> <p>UST Decommissioning</p> <p>a. 15.4 tons b. See Figure 4 from Underground Storage Tanks Decommissioning Report (Hart Crowser, 1998). c. On December 17, 1997, the stockpiled soil was disposed of at TPS Technologies, a permitted thermal treatment facility in Portland, Oregon d. Between December 9 and 12, 1997 e. Terra Hydr, Inc. f. During the decommissioning of three USTs, impacted soil was identified beneath the fueling pad of the diesel UST. g. Diesel and heavy-oil range hydrocarbons were identified in samples collected h. NWTPH-HCID Method and NWTPH-Dx Method. Diesel and heavy-oil were detected in the sample at concentrations of 6,900 mg/kg and 708 mg/kg, respectively. i. NWTPH-HCID Method and NWTPH-Dx Method. Diesel and heavy-oil were detected in samples at concentrations ranging from 52.6 to 143 mg/kg and 72 to 197 mg/kg, respectively. j. Port of Portland, Hart Crowser and Terra Hydr</p> <p>See also response to Questions 13 (j) and 71.</p>	<p>with TPH Excavation and Disposal Activities, Terminal 2 - Building 3060, Heating Oil, 3556 NW Front Avenue, Portland, Oregon, Port Project No. 51908-112, DEQ File No. 26-98-0081. March 5, 1998.</p> <p>Hart Crowser. 1998. Underground Storage Tanks Decommissioning Report, Port of Portland Terminal 2, Portland, Oregon. February 23, 1998.</p>
<p>65. Have you ever tested the groundwater under your Property? If so, please provide copies of all data, analysis, and reports generated from such testing.</p>	<p>Yes, the groundwater under the property was investigated during an environmental investigation; grab groundwater samples were collected during the investigations of former Building 3060 (see response to Question 71 below). No other upland groundwater investigations have been performed at the property.</p> <p>See also response to Question 13 (h) for monitoring well information.</p>	<p>See site investigation records at Tab 6, specifically:</p> <p>Hart Crowser. 1998. Remedial Action and Subsurface Characterization Report, Terminal 2 - Former Building 3060, 3556 NW Front Avenue, Portland, Oregon. Prepared for the Port of Portland. October 21, 1998.</p>
<p>66. Have you treated, pumped, or taken any kind of response action on groundwater under your Property? Unless the answer to the preceding question is anything besides an unequivocal "no", identify and provide copies of any documents regarding:</p>	<p>No.</p>	

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
<ul style="list-style-type: none"> a. reason for groundwater action; b. whether the groundwater contained hazardous substances, pollutants or contaminants, including petroleum, what constituents the groundwater contained, and why the groundwater contained such constituents; c. all analyses or tests and results of analyses of the groundwater; d. if the groundwater action has been completed, describe the basis for ending the groundwater action; and e. all persons, including contractors, with information about (a) through (c) of this request. 		
<p>67. Was there ever a spill, leak, release or discharge of a hazardous substance, waste, or material into the Willamette River from any equipment, structure, or activity occurring on, over, or adjacent to the river? If the answer to the preceding question is anything but an unqualified "no", identify and provide copies of any documents regarding:</p> <ul style="list-style-type: none"> a. the nature of the hazardous substance, waste, or material spilled, leaked, released or discharged; b. the dates of each such occurrence; c. the amount and location of such release; d. were sheens on the river created by the release; e. was there ever a need to remove or dredge any solid waste, bulk product, or other material from the river as a result of the release? If so, please provide information and description of when such removal/dredging occurred, why, and where the removed/dredged materials were disposed. 	See response to Question 22 above.	
<p>68. For any releases or threatened releases of PCB(s), identify the date, quantity, location and type of PCB(s) or PCB(s) containing materials or liquids, and the nature of any response to or cleanup of the release.</p>	See response to Question 62.	
<p>69. For any releases or threatened releases of PCB(s) and/or PCB(s) containing materials or liquids, identify and provide copies of any documents regarding the quantity and type of waste generated as a result of the release or threatened release, the disposition of the waste, provide any reports or records relating to the release or threatened release, the response or cleanup and any records relating to any enforcement proceeding relating to the release or threatened release.</p>	<p>See response to Question 62.</p> <p>See Tab 7 for PCB-containing transformer disposition records.</p>	
Section 7.0 - Property Investigations		

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
70. Provide information and documentation concerning all inspections, evaluations, safety audits, correspondence and any other documents associated with the conditions, practices, and/or procedures at the Property concerning insurance issues or insurance coverage matters.	<p>The Port has been having communications with its insurers regarding defense and settlement of third party claims associated with the Portland Harbor Superfund Site. The communications between the Port and its insurers are confidential communications in an ongoing insurance settlement process among the Port and its insurers and their respective legal counsel in respect of which the Port and its insurers have common interests adverse to third party governmental agencies and other potentially responsible parties in the Harbor (including associated upland sites) where there is actual or reasonable likelihood of future litigation. Such communications are attorney-client and work product privileged confidential communications under the common interest doctrine. As relates to Terminal 2, the factual information underpinning these confidential communications has, nonetheless, been disclosed in the documents and responses provided to these questions.</p> <p>See also response to Question 51.</p>	
71. Describe the purpose for, the date of initiation and completion, and the results of any investigations of soil, water (ground or surface), sediment, geology, and hydrology or air quality on or about each Property. Provide copies of all data, reports, and other documents that were generated by you or a consultant, or a federal or state regulatory agency related to the investigations that are described.	<p>1974 Foundation Support Consultation. Consultation was provided on plans for wood piles support of a proposed office building and to provide recommendations regarding the alternative use of augercast piles. During this work in July 1974, explorations were made to interpret the subsurface profile. The explorations indicated that the office site was underlain by 30 to 40 feet of medium dense sand fill that was then underlain by 20 to 25 feet of stratified river deposits of stiff silty soils and medium dense sands followed by several tens of feet of a sand formation. Following the explorations, it was determined that the proposed building could be supported on conventional spread footings.</p> <p>1975 Dredging Requirement. Elutriate tests were collected at Terminal 2, Berth 205 as a part of the permit requirements for dredging and to evaluate disposal options. The sample collected had concentrations of copper, lead and zinc.</p> <p>Marine Terminals Rehabilitation Preliminary Engineering Geotechnical Considerations. In 1981, Foundation Sciences, Inc. reviewed subsurface soil conditions to preliminarily evaluate the geotechnical aspects of the Port's proposed rehabilitation of Terminal 2. The review indicated that two modes of slope failure were likely to occur during fill construction, but that settlements from constructing a berm and removal of structures above 5 feet of normal low water should limit any failure. It was also identified that construction of the existing wharf in Berth 205 be reconsidered due to settlement impacts in the anchored bulkhead wall. Lastly, the circular cell wharf and pile-supported structures were reviewed and appeared feasible, and the performance of the Reefer House, Firehouse and Western Transportation Office Building were unlikely to be affected by proposed fill operations.</p> <p>1984 Sediment Bioassays. Sediment samples were collected during Fall 1984. The purpose of the sampling was not identified in the available records. Results from the analysis determined that no significant acute toxicity was observed in either liquid- or solid-phase bioassays.</p> <p>Hydraulic Analysis for Terminal 2 Reconstruction. In 1984, a hydraulic analysis was performed to identify the effect on the Willamette River from the proposed reconstruction of the Terminal 2 property. Results of the analysis indicated that a reduction in maximum channel section would result in a theoretical increase in water</p>	<p>See property transaction records at Tab 5, specifically:</p> <p>Letter Report to Crown Zellerbach Corporation, Attention: R.S. Wiitala, Re: Report, Consultation regarding Foundation Support, Proposed New Office and Mooring Facilities Adjacent to Western Transportation Co., Portland, Oregon. August 5, 1974.</p> <p>Foundation Sciences, Inc. 1981. Port of Portland Marine Terminals Rehabilitation, Preliminary Engineering, Geotechnical Considerations. October 1981.</p> <p>Ogden Beeman & Associates, Inc. 1984. Hydraulic Analysis for Terminal 2 Reconstruction. February 1984. Geotech Investigation for T2 Rehab 1986</p> <p>Letter Report to Port of Portland, Attention: Howard Kido, Subject: Final Report, Geotechnical Investigation for Proposed House 204 at Terminal 2 for the Port of Portland.</p> <p>Letter Report to Howard Kido, Port of Portland, Re: Foundation Studies, Terminal 2 Administration Building. T2 Spillway Silt Removal & Pavement Design</p>

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
	<p>surface elevation for the 100 year flood of 0.03 feet; that a decreased channel width would result in increased velocities for a 100 year flood condition; that configuration of a new dock would result in some sedimentation due to bedload transport; and that sedimentation of suspended sediments would be minimal.</p> <p>Geotechnical Investigation and Testing. From late 1984 through mid-1986, a geotechnical investigation was conducted for the design of proposed pavements in the Port's rehabilitation of the Terminal 2 property. Phase I involved the investigation of near-surface soil conditions with shallow test pits plus laboratory testing to evaluate treated and untreated subgrade materials. Phase II consisted of sampling and testing dredged fill sand placed at the site during the winter of 1985-86. Phase I activities revealed uniform subgrade soil conditions consisting of fine to medium sand with scattered fine gravel and traces of silt. Density and plat-bearing tests were also completed on these soils. Samples were collected and sent to the laboratory for moisture content, grain-size analysis, compaction, compression, freeze-thaw and wet-dry durability and resilient modulus testing. Phase II included density testing and sample collection for gradation analysis, compaction, and resilient modulus testing.</p> <p>Terminal 2 Rehabilitation: Yard and Utilities. In 1986, eight push tube samples from test pits were collected to analyze the impact of a silt layer during pavement thickness activities. Alternative solutions for paving were recommended, however, Pavement Services, Inc indicated that the silt had a critical effect on the pavement and that additional testing of the silt should be performed to develop a more economical solution.</p> <p>Dynamic Pile Test Phase II. Investigation into the dynamic measurements of piles, including the assessment of soil resistance was completed in May 1986 for the Terminal 2 property rehabilitation work. Soil resistance values, both computed and bearing, ranged from 334 to 510 kips and correlated with installation blow counts.</p> <p>Terminal 2 Administration Building. In 1986, an evaluation of subsurface conditions beneath the proposed Terminal 2 Administration Building was performed to assist in the design of the facility as it related to foundations and earthwork. Boring results indicated that the site is underlain by several tens of feet of fine to medium dredged sand. Based on these results, Shannon and Wilson, Inc. recommended that the site was suitable for conventional spread footing foundations.</p> <p>House 204 Geotechnical Investigation. During June 1987, an investigation was conducted to evaluate subsurface conditions of the proposed site for Warehouse 204 and provide recommendations for foundation support. Five soil borings and laboratory testing (moisture content and one-dimensional consolidation test) were completed during this investigation. The subsurface explorations indicated that the site is underlain by relatively competent dredged sand fill which extends to a minimum depth of 60 ft. Geotechnical Resources Inc. assessed the results and indicated that a conventional spread footing foundation could be used to support the proposed warehouse.</p> <p>1989 Waste Characterization. In 1989, Hahn and Associates completed a waste characterization of sludge generated from steam cleaning activities. Based on analytical results, the steam cleaning residue was determined non-hazardous and could be disposed of with a special permit at the St. John's landfill.</p> <p>Abandoned Drum Disposal. In 1989, Hahn and Associates completed a waste characterization and disposal of seven drums from Terminal 2. The drums were determined to be from the steam cleaning pit and contained non-</p>	<p>1986</p> <p>See site investigation records at Tab 6, specifically:</p> <p>Port of Portland. 2000. Preliminary Assessment, Port of Portland, Terminal 2, 3556 NW Front Avenue, Portland, Oregon, 97210. August 29, 2000.</p> <p>Port of Portland. 2000. Terminal 2, Preliminary Assessment Appendix I.</p> <p>Port of Portland. 2000. Terminal 2, Preliminary Assessment Appendix II.</p> <p>Hart Crowser. 1998. Underground Storage Tanks Decommissioning Report, Port of Portland Terminal 2, Portland, Oregon. February 23, 1998.</p> <p>Hart Crowser. 1998. Remedial Action and Subsurface Characterization Report, Terminal 2 - Former Building 3060, 3556 NW Front Avenue, Portland, Oregon. Prepared for the Port of Portland. October 21, 1998.</p> <p>Ash Creek Associates, Inc./NewFields. 2007. Revised Stormwater Evaluation Work Plan. December 2007.</p> <p>See Tab 7 other environmental records, specifically:</p> <p>Letter to A.J. Heineman, Portland District, U.S. Army Corps of Engineers, Re: 071-OYA-1-001903 - Port of Portland. September 22, 1975.</p> <p>2007-050 U.S. Army Corps of Engineers/Oregon Department of State Lands Joint Permit Application for Maintenance Dredging, Marine Terminal 2, Berths 205 and 206, Lower Willamette River, Portland, Oregon.</p>

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
	<p>hazardous TPH/liquid and solids. The drums were stored at Terminal 4 and removed on September 3, 1992 for recycling at the Spencer Environmental Services recycling plant in Portland, Oregon. Between September 23 through 25, 1992, material containing TPH/solid non-hazardous waste was solidified and prepared for disposal at Arlington Landfill, Arlington, Oregon. Solidification and disposal preparation was performed by Chemical Waste Management of the Northwest Landfill located in Arlington, OR (CWM) under contract with the Port.</p> <p>1990 Rose Festival Dredging. Sediment samples were collected at six locations at Terminal 2 as part of the 1990 Rose Festival dredging. No constituents were detected above their respective Lower Columbia River Management Area (LCRMA) Screening Levels.</p> <p>1991 Disposal of Grease Pit Sludge. In October 1991, Hahn and Associates completed waste profiling work to characterize sludge in the steam cleaning facility sump and evaluate disposal options. A sample of the sludge was analyzed for PCBs and TPH. Based on the analytical results, the sludge was disposed of as non-hazardous material.</p> <p>1992 Disposal of Grease Pit Sludge. In February 1992, Hahn and Associates completed waste profiling work to characterize the contents of the steam cleaning sump, identify disposal options, and dispose of the sludge. These activities took place from February 1992 through August 1992. The sample of the sump's contents was analyzed for HVOCs, BTEX, PCBs, TPH, and TCLP metals. The analyses did not detect concentrations of hazardous substances above regulatory levels. Accordingly, the sump material was acceptable for oil recycling and landfill and was taken off-site for disposal by Spencer Environmental Services, Inc. (SES).</p> <p>1993 Dredging Requirements. In 1993, three surface grab sediment samples were collected at Terminal 2 as a part of the permit requirements for dredging at Berths 204-206. The samples were analyzed for metals, organochlorine pesticides and PCBs, VOCs, phthalates, PAHs, phenols, and organotins. None of the constituents were found to be present above their respective LCRMA Screening Levels.</p> <p>1994 Drain Cleanout Activities. On November 19, 1994, Hahn and Associates collected aqueous- and solid-phase samples to characterize waste material that had been generated during drain clean-out activities and to evaluate appropriate treatment or disposal options. The samples were analyzed to determine whether or not the material exhibited hazardous waste characteristics. The aqueous phase of the material was analyzed for the presence of TPH and the solid phase of the material was analyzed for PCBs. Based upon analytical data, the aqueous material was determined to be non-hazardous liquid and was collected by Northwest Field Services for treatment at Harbor Oil Company in Portland, Oregon. The solid material was determined to be non-hazardous and was disposed at Hillsboro Landfill in Hillsboro, Oregon.</p> <p>1996 Dredge Samples. On November 12 and 13, 1996, Hart Crowser collected sediment samples to assess the quality of the dredge prism for maintenance dredging proposed for Berths 204, 205, and 206. The samples were analyzed for metals, butylins, pesticides, PCBs, PAHs, and phenols. All of the constituents detected in the samples were below LCRMA Screening Levels and the sediments were determined to be suitable for unconfined, open-water disposal. These samples were collected for the 1997 maintenance dredging performed at Terminal 2.</p>	<p>Memo to Ronald R. Garton, Environmental Protection Agency, Subject: Portland Terminal #2 Sediment Bioassays. January 8, 1985.</p> <p>Hahn and Associates. 1993. Abandoned Drum Disposal, Marine Terminals 2, 4 and 6, Port of Portland, Portland, Oregon. March 5, 1993.</p> <p>Letter Report to Russ Korvola, Port of Portland, Subject: Disposal of Grease Pit Sludge, Marine Terminal 2, Port of Portland, Portland, Oregon. September 19, 1992.</p> <p>Letter to Mark Sipola, U.S. Army Corps of Engineers, Re: Sediment Test Results from Sampling and Analysis Plan for Maintenance Dredging of Berths 104, 204, 205, 206, and 501. December 9, 1996.</p> <p>Hahn and Associates, Inc. 1992. Used Oil and Sludge Characterization and Disposal Option Determination, Hydraulic Lift Sump, Maintenance Gear Locker, Marine Terminal 6 and Steam Cleaning Drain System, Marine Terminal 2, Portland, Oregon. April 24, 1992.</p> <p>Memo to Pad Quinn and John Childs, Port of Portland, Re: Port of Portland - Terminal 2 - Demolished Building 3060, Soil and Groundwater Chemical Results to Date, Port Project: 51908, Task : 112, J-5733. May 14, 1998.</p> <p>Letter Report to Andree Pollock, Oregon Department of Environmental Quality, Re: Focused Site Investigation, Terminal 2, Former Building 3060, 3556 NW Front Avenue, Portland, Oregon, DEQ File No. 26-98-0081, Port Project No. 51908, Task No. 112, 5733-01. September 28, 2001.</p> <p>Letter to Dana Siegfried, Port of Portland, Re:</p>

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
	<p>UST Decommissioning. Three underground tanks (1,500-gallon used oil 2,750 diesel, 5,500-gallon gasoline) located south of the gearlocker building were removed in December 1997. Petroleum hydrocarbons were not detected in soil samples taken below each of the USTs. Diesel was detected in soil beneath a concrete fueling pad and approximately 15.4 tons of diesel-impacted soil was removed from the fueling area. Confirmation sampling following the excavation indicated that all soil with petroleum hydrocarbon concentrations above DEQ Level 2 soil matrix cleanup levels was removed. DEQ subsequently closed the file and no further action was required.</p> <p>1998 Dredging Samples. In September 1998, sediment core samples were collected adjacent to Terminal 2 to determine whether the material was suitable for unconfined, open-water disposal. The Hart Crowser report documenting the investigation, titled "Sediment Characterization Study, Marine Terminal 2, Berths 203-206", dated March 17, 1999, was previously supplied to EPA under the Administrative Order on Consent for the Portland Harbor RI/FS.</p> <p>Demolition of Buildings 3060 and 3070. Following the 1998 demolition of buildings 3060 and 3070, stained soil was discovered beneath the basement floor of building 3060. In addition, SSA's used oil handling practices in the vicinity of building 3070 were questioned during a 1991 ESA. Both of these issues were investigated.</p> <ul style="list-style-type: none"> • February 1998 Investigation. On February 4, 1998, soil samples were collected beneath demolished buildings 3060 and 3070. Diesel and heavy oil range hydrocarbons were detected in samples collected from the former building 3060 area; petroleum hydrocarbons were not detected in the sample from the former building 3070 area. The release beneath building 3060 was reported to DEQ. On February 6, 1998, 108 tons of soil with diesel and heavy oil were excavated from beneath the basement floor of building 3060 and stockpiled at Terminal 2. Confirmation soil samples were collected and results indicated that petroleum hydrocarbons were not detected in soil above applicable cleanup levels. Soil with TPH was disposed of at TPS Technologies in Portland, Oregon on February 23, 1998. • April 1998 Investigation. On April 17, 1998 additional soil and groundwater samples were collected during installation of four Geoprobe explorations to determine the depth and concentration of affected soil and to assess whether groundwater was impacted. Oil range hydrocarbons were detected in soil from the former excavation area. PAHs were detected in one groundwater sample; however, only pyrene and chrysene were detected above applicable risk-based levels. Soil samples indicated detected concentrations of PAHs. • Focused Site Investigation. In October 2000, five additional Geoprobe explorations were completed to gather data to characterize the extent of petroleum hydrocarbons present and prepare a Risk-Based Corrective Action (RBCA) closure for the site. Soil and groundwater samples were collected and analyzed for TPH, BTEX and PAHs. Soil concentrations were below applicable risk-based concentrations (RBCs) for the exposure pathways considered complete in the conceptual site model. No beneficial uses of groundwater were identified, and groundwater concentrations were below RBCs for applicable volatilization pathways. Based on the comparison of site data to the RBCs for soil and groundwater, no additional action was recommended for the site. <p>1999 Sediment Characterization. In 1999, Hart Crowser completed a dredge material characterization at</p>	<p>Preliminary Review of Sediment Chemistry Data from River Terminals 1,2, and 5; Willamette River, Portland, OR. December 5, 1996.</p> <p>Letter to Russ Korvola, Port of Portland, Subject: Sampling of Steam Cleaning Residues Stored at Terminal 4. November 30, 1989.</p> <p>Hart Crowser. 2008. Biological Testing Results, Terminal 2 Berth 205. June 18, 2008.</p> <p>Hart Crowser. 2008. Sediment Characterization Report, Marine Terminal 2, Berths 205 and 206, March 20, 2008.</p> <p>Hart Crowser. 2008. Post-Dredge Sediment Characterization Results, Terminal 2 Berth 205 – Upstream Portion. August 18, 2008.</p>

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
	<p>Terminal 2. Two composite sediment samples were collected, one off Berth 203 and one off Berth 204. Samples were analyzed for metals, tributyltin (TBT), polynuclear aromatic hydrocarbons (PAHs), phenols, phthalates, pesticides, and PCBs. TBT, phenols, and herbicides/pesticides were generally not detected, except for a trace concentration of DDE that was detected in one sample. Metals were detected at concentrations below the DEQ Joint Source Control Strategy (JSCS) screening levels (DEQ, 2005). Several PAHs were detected, but at concentrations below JSCS screening levels. Aroclor 1260 was detected in one sample (B203-C1) at a concentration below JSCS screening levels. Sample B203-C1 was collected off-site of the Terminal in the Fireboat Cove, north of Basin A.</p> <p>2000 Dredge Material Characterization Study. In June 2000, sediment core samples were collected to characterize the quality of the material off-site of the Terminal 2 berths for permitting and placement at a rehandling facility, and to ensure protection of surface water and groundwater during placement and rehandling activities. The Hart Crowser report documenting the investigation, titled "Dredge Material Characterization Study, Marine Terminal 2, Berths 203-206, Marine Terminal 5, Berth 501" dated August 24, 2001, was previously supplied to EPA under the Administrative Order on Consent for the Portland Harbor RI/FS.</p> <p>Storm Water Evaluation. The Port is currently completing a Storm Water Evaluation to confirm storm water from the Terminal 2 property is not a current source to the Willamette River. The evaluation includes sample collection from four representative storm events and analysis for TPH-Dx, phthalates, PCB Aroclors, and PAHs. During March 2008, samples from three of the four storm events were collected and analyzed. The fourth and final storm event is planned for Fall 2008. Analytical results from the three sampling events indicate low to trace concentrations of some PAHs and bis(2-ethylhexyl) phthalate. Under its permits, the Port regularly maintains and cleans catch basins and drain inlets annually. This maintenance was last performed at the property in November 2007. Currently a storm line and catch basin cleanout is planned for 2008.</p> <p>2008 Sediment Characterization Report. In January 2008, five sediment cores were collected at Berths 205 and 206 adjacent to Terminal 2 to evaluate the quality of the proposed dredge material and the future "leave surface" or new surface material (NSM). Analytical results of the samples indicated a consistent quality of sediment within the berth areas. Data were compared to Sediment Evaluation Framework (SEF) SLs. In composite samples, benzoic acid and DEHP were detected slightly above SEF SLs (less than 1.3 enrichment ratio). These two chemicals of interest (COIs) were also present above SLs in one of the three discrete samples.</p> <p>2008 Post-Dredge Sediment Characterization Results. On August 13, 2008, post-dredge sampling and analysis of the NSM at Berth 205 was performed in accordance with the decision of the agency's Project Review Group. Analytical results of the post-dredge samples indicate that no benzoic acid and DEHP did not exceed the SEF SLs. Based on the analytical results and the agreement with the Project Review Group, no post-dredge cap was required.</p>	

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
72. Describe any remediations or response actions you or your agents or consultants have ever taken on each Property either voluntarily or as required by any state or federal agency. If not otherwise already provided under this Information Request, provide copies of all investigations, risk assessments or risk evaluations, feasibility studies, alternatives analysis, implementation plans, decision documents, monitoring plans, maintenance plans, completion reports, or other document concerning remediation or response actions taken on each Property.	See response to Questions 70 and 71 for the remediation and response actions conducted at the site.	
73. Are you or your consultants planning to perform any investigations of the soil, water (ground or surface), geology, and hydrology or air quality on or about the Property? If so, identify: a. what the nature and scope of these investigations will be; b. the contractors or other persons that will undertake these investigations; c. the purpose of the investigations; d. the dates when such investigations will take place and be completed; and e. where on the Property such investigations will take place.	No.	
Section 8.0 - Corporate Information		
74. Provide the following information, when applicable, about you and/or your business(es) that are associated with each Property identified in response to Question 4:	See response to bullets (a) through (e) below.	
a. state the current legal ownership structure (e.g., corporation, sole proprietorship);	The Port of Portland was created by the Oregon legislature in 1891. Oregon Revised Statutes 777 and 778 contain the authority of the Port of Portland. It is a state Port District for an area encompassing all of Multnomah, Clackamas and Washington Counties. The Port is governed by a nine person commission appointed by the Governor of Oregon and confirmed by the State Senate.	See ORS 777 and 778 information in Tab 8 of the Port's 104(e) response for Willamette Cove, submitted to EPA and dated June 18, 2008.
b. state the names and current addresses of current and past owners of the business entity or, if a corporation, current and past officers and directors;	Port of Portland 121 NW Everett Portland, OR 97209	
c. discuss all changes in the business' legal ownership structure, including any corporate successorship, since the inception of the business entity. For example, a business that starts as a sole proprietorship, but then incorporates after a few years, or a business that is subsequently acquired by and merged into a successor. Please include the	Not applicable.	

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
dates and the names of all parties involved;		
d. the names and addresses of all current or past business entities or subsidiaries in which you or your business has or had an interest that have had any operational or ownership connection with the Properties identified in response to Question 4. Briefly describe the business activities of each such identified business entities or subsidiaries; and	Not applicable.	
e. if your- business formerly owned or operated a Property identified in response to Question 4, describe any arrangements made with successor owners or operators regarding liability for environmental contamination or property damage.	Not applicable.	
75. List all names under which your company or business has ever operated and has ever been incorporated. For each name, provide the following information:	Port of Portland Registered Trademark Name - Rivergate Industrial District	
a. whether the company or business continues to exist, indicating the date and means by which it ceased operations (e.g., dissolution, bankruptcy, sale) if it is no longer in business;	Yes, the Port of Portland is extant.	
b. names, addresses, and telephone numbers of all registered agents, officers and operations management personnel; and	Registered Agent: Carla L. Kelley General Counsel Port of Portland 121 NW Everett Street Portland, OR 97209 503-944-7031 President, Port Commission Judith A. Johansen Marylhurst University 17600 Pacific Highway (Hwy 43) P.O. Box 261 Marylhurst, OR 97036 503-699-6266 Vice President, Port Commission Mary F. Olson Norris, Olson & Associates, Inc. 7105 SE 19 th Ave.	

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
	<p>Portland, OR 97202 503-235-2425</p> <p>Treasurer, Port Commission William D. Thorndike, Jr Medford Fabrication PO Box 1588 1109 Court Street Medford, OR 97501 541-770-1172</p> <p>Secretary, Port Commission Steven H. Corey Corey, Byler, Rew, Lorenzen & Hojem PO Box 218 Pendleton, OR 97801</p>	
c. names, addresses, and telephone numbers of all subsidiaries, unincorporated divisions or operating units, affiliates, and parent corporations if any, of the Respondent.	Not applicable.	
76. Provide all copies of the Respondent's authority to do business in Oregon. Include all authorizations, withdrawals, suspensions and reinstatements.	Oregon Revised Statutes 777 and 778.	See ORS 777 and 778 information in Tab 8 of the Port's 104(e) response for Willamette Cove, submitted to EPA and dated June 18, 2008.
77. If Respondent is, or was at any time, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the full nature of each such corporate relationship, including but not limited to:	Not applicable.	
a. a general statement of the nature of relationship, indicating whether or not the affiliated entity had, or exercised, any degree of control over the daily operations or decision-making of the Respondent's business operations at the Site;	Not applicable.	
b. the dates such relationship existed;	Not applicable.	
c. the percentage of ownership of Respondent that is held by such other entity(ies);	Not applicable.	
d. for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities, as well as the names and addresses of each such affiliated entity's officers, directors, partners, trustees, beneficiaries, and/or shareholders owning more than five percent of that	Not applicable.	

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
affiliated entity's stock;		
e. provide any and all insurance policies for such affiliated entity(ies) which may possibly cover the liabilities of the Respondent at each Property; and	Not applicable.	
f. provide any and all corporate financial information of such affiliated entities, including but not limited to total revenue or total sales, net income, depreciation, total assets and total current assets, total liabilities and total current liabilities, net working capital (or net current assets), and net worth.	Not applicable.	
78.If Respondent is a partnership, please describe the partnership and provide a history of the partnership's existence. Provide a list of all current and past partners of any status (e.g., general, limited, etc.) and provide copies of all documents that created, govern, and otherwise rules the partnership, including any amendments or modifications to any of the originals of such documents, and at least five years of partnership meeting minutes.	Not applicable.	
Section 9.0 - Compliance With This Request		
79.Describe all sources reviewed or consulted in responding to this request, including, but not limited to:	Records reviewed for this request include the following Port departments: Marine and Industrial Development (MID) Environmental Affairs Legal Research Engineering	
a. the name and current job title of all individuals consulted;	Nicole LaFranchise (Environmental Project Manager), Sara Moore (Environmental Liability Analyst), , Sebastian Degens (Marine Planning & Development Manager), Suzanne Barthelmess (Claims Manager), Mic Dorrance (Marine Maintenance Manager), Scott Carter (Property Manager), Lorali Sinnen (Property Manager II), Sheila David (Environmental Analyst), Sabrina Rowlette (Environmental Technician), Richard Vincent (Environmental Project Manager II), Jeff Krug (Terminal Manager), Lee Roundtree (General Manager, Marine Operations)	
b. the location where all sources reviewed are currently reside; and	Port of Portland offices and records storage	
c. the date consulted.	August-September 2008.	

Port of Portland
104(e) Response for Terminal 2

EPA Question	Response	Reference
80. If not already provided, identify and provide a last known address or phone number for all persons, including Respondent's current and former employees or agents, other than attorneys, who have knowledge or information about the generation, use, purchase, storage, disposal, placement, or other handling of hazardous materials at, or transportation of hazardous substances, waste, or materials to or from each Property identified in response to Question 4.	Not applicable.	
81. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following;	<p>Records Review and Destruction Notices were reviewed to determine if any relevant records were destroyed pertaining to Terminal 2 property. Consistent with public-recordkeeping requirements, the Records Review and Destruction Notices are maintained at the Port of Portland Administrative office. The Destruction Notices contain standard information including the former archive box number, originating department, and date of destruction. Limited information is provided on the contents of the files formerly contained within the boxes; records are described generally, using categories such as "miscellaneous correspondence," "chronological files," "memos," etc. While some provide a reference to a property to which the records may have pertained, it is so general that there is no way to determine with any certainty the nature or content of the documents that were destroyed.</p> <p>Based on documentation of waste disposal, it was apparent that not all of the contracts responsive to Question 39 were contained in available records.</p>	
a. the document retention policy between 1937 and the present;	<p>The Port is required by law to retain all "public records" for at least the period of time specified in a retention schedule approved by the State Archivist. The Port of Portland Records Retention and Disposition Schedule is the approved retention schedule for the Port of Portland. "Public records" include documents, books, papers, photographs, files, sound recordings, or machine-readable electronic records, regardless of physical form or characteristics, which are made, received, filed, or recorded by the Port in connection with the transaction of Port business.</p> <p>Employees must adhere to records retention and destruction procedures established by the Port's records manager in accordance with State statutes and the Port of Portland Records Retention and Disposition Schedule.</p> <p>The Port's retention and disposition schedules were suspended for records relevant to Portland Harbor when the Port received notice of Portland Harbor's listing on the National Priority List in December 2000.</p>	See Ordinance 142, 149, 196, 2001 Records Retention Schedule, 2001 Records Retention with 2003 Revision, and 2008 Records Retention Schedule information in Tab 8 of the Port's 104(e) response for Terminal 1 North, submitted to EPA and dated July 16, 2008.
b. the approximate date of destruction;		
c. a description of the type of information that would have been contained in the documents;	Not applicable	

Port of Portland
104(e) Response for Terminal 2

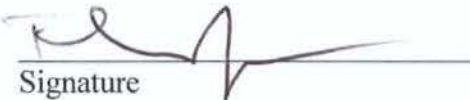
EPA Question	Response	Reference
d. the name, job title and most current address known by you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; the person(s) who would have been responsible for destroying the documents; and the person(s) who had and/or still have the originals or copies of these documents; and	Michael Wells Records Manager Port of Portland 121 NW Everett Street Portland, OR 97209	
e. the names and most current addresses of any person(s) who may possess documents relevant to this inquiry.	None known.	
82. Provide a description of all records available to you that relate to all of the questions in this request, but which have not been included in your responses.	The Port believes that it is reasonably likely that it will be in litigation with others over the responsibility for contamination in the Portland Harbor Superfund Site adjacent to Terminal 2. Work product in anticipation of litigation and written communications in order for the Port to obtain legal advice relating to the environmental liability issues associated with the Superfund Site, including attorney-client and work product communications, are not disclosed as part of this submission; however, no underlying facts referenced in such confidential communications that are responsive to these questions have been withheld on these confidentiality grounds. See also response to Question 70. This response is based on the documents the Port has been able to identify and review to date. If additional information responsive to this request becomes available or is encountered, it will be submitted under separate cover.	



DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of Respondent and that the attached response for Terminal 2 is complete, true, and correct to the best of my knowledge.

Executed on September 11, 2008


Signature

Tom Imeson
Print Name

Public Affairs Director
Title

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